COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"Enriching Lives"

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IN REPLY PLEASE
REFER TO FILE: C-1

October 9, 2003

The Honorable Board of Supervisors
County of Los Angeles
383 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, CA 90012

Dear Supervisors:

SAN GABRIEL DAM AND RESERVOIR
CERTIFY FINAL SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT
FOR SAN GABRIEL CANYON SEDIMENT MANAGEMENT PLAN
APPROVE POST-FIRE SEDIMENT REMOVAL PROJECT
ADOPT AND ADVERTISE PROJECT
SUPERVISORIAL DISTRICT 5
3 VOTES

IT IS RECOMMENDED THAT YOUR BOARD ACTING AS THE GOVERNING BODY OF THE LOS ANGELES COUNTY FLOOD CONTROL DISTRICT:

1. Consider the proposed Final Supplemental Environmental Impact Report (SEIR) for the San Gabriel Canyon Sediment Management Plan (project) (Enclosure A), including the comments received and responses thereto; and certify that, pursuant to State California Environmental Quality Act (CEQA) Guidelines § 15090, (1) the SEIR reflects the independent judgment and analysis of the County of Los Angeles; (2) the SEIR has been completed in compliance with CEQA, and (3) the SEIR was presented to your Board, and your Board has reviewed and considered the information contained therein in its decision-making process prior to approving the project.

2. Adopt the Findings of Fact and Statement of Overriding Considerations (Enclosure B) for the project.

3. Adopt the Mitigation Monitoring and Reporting Program (Enclosure C).

4. Authorize Public Works to submit a request for the filing fee to the County Clerk for payment of the Department of Fish and Game filing fee required by Public Resources Code § 21089, to be paid concurrent with the filing of the Notice of Determination.

5. Approve the project and adopt the plans and specifications for San Gabriel Dam and Reservoir Post-Fire Sediment Removal in the Angeles National Forest (Supervisorial District 5) at an estimated cost between $40,000,000 and $60,000,000.

6. Call for bids to be received on December 23, 2003.

7. Instruct the Executive Officer of the Board of Supervisors to advertise the project and to seal and return the plans and specifications to Public Works for filing.

8. Direct Public Works to file a Notice of Determination within five working days of project approval, as set forth in State CEQA Guidelines § 15094.

PURPOSE/JUSTIFICATION OF RECOMMENDED ACTION

The 2002 Curve and Williams Fires burned vegetation covering over 30 percent of the watershed tributary to San Gabriel Dam and Reservoir. Due to the Curve and Williams Fires, your Board, in October 2002, authorized Public Works to utilize emergency contracting procedures to immediately implement protection measures for the outlet works at San Gabriel Dam and found the project to be exempt from CEQA. The outlet protection measures have been installed, but the burned condition of the watershed and the resultant erosion potential will continue to cause an emergency situation at San Gabriel Dam and Reservoir over the next several years until the watershed significantly recovers.

Public Works needs to remove a minimum of 5 million cubic yards of sediment from the reservoir during the next five years to maintain the efficacy of the outlet protection measures and to continue to meet the reservoir capacity requirements set forth in the U.S. Army Corps of Engineers' Los Angeles County Drainage Area (LACDA) Study. Without sediment removal, additional deposition could cause the dam's outlet works to become inoperable and thus prevent controlled releases of storm water. This could seriously jeopardize flood protection to downstream communities provided by proper operation of the outlet works.

In June 1998, your Board certified the Final EIR (CEIR) for the San Gabriel Canyon Sediment Management Plan (SGCSMP). The CEIR discussed routine reservoir sediment removal from San Gabriel Reservoir under normal conditions and the associated impacts. The possible cleanout methods analyzed for the San Gabriel Reservoir in the CEIR included sluicing to Morris Reservoir, dredging to Morris Reservoir, and conveying sediment on a conveyor belt to the Burro Canyon Sediment Placement Site (SPS). In January 1998, the Corps, the Federal lead agency for the National Environmental Policy Act, issued its Record of Decision for the SGCSMP's Environmental Impact Statement, which also covered routine cleanouts. The CEIR and the Environmental Impact Statement determined that sluicing to Morris Reservoir was the least environmentally damaging and most practicable alternative for routine sediment removal from San Gabriel Reservoir.

The CEIR discussed major cleanout alternatives and associated environmental impacts resulting from emergency events but did not identify a preferred major cleanout alternative. The SEIR provides information necessary to update the CEIR, as required by Section 15163 of the State CEQA Guidelines, to discuss the environmental impacts of the proposed emergency major cleanout of the reservoir resulting from the Curve and Williams Fires. The SEIR analyzed "Alternative 5" as the proposed project, which included a combination of cleanout methods consisting of sluicing to Morris Reservoir, conveying sediment on a conveyor belt to the Burro Canyon SPS, and trucking sediment to Burro Canyon SPS. However, on the basis of comments to the SEIR and other factors including secondary impacts of sluicing, staff recommends that the County eliminate the portion of "Alternative 5" that called for sluicing to Morris Reservoir. Certification of the SEIR and approval of the recommended actions will fulfill the requirements of CEQA for the proposed post-fire emergency sediment removal project and authorize the project to proceed.

The Corps remains the Federal lead agency in regards to compliance with National Environmental Policy Act with the U.S. Forest Service as a Federal coordinating agency for this emergency major cleanout project. The Corps has determined the proposed project requires only a minor modification of the previously issued permit with a time extension. The Corps determined that the preparation of an Environmental Assessment is sufficient to fulfill the requirements of National Environmental Policy Act. The Corps will issue its Decision Notice on the Environmental Assessment for this project in October 2003.

Public Works proposes to engage a contractor to excavate 5 million cubic yards of sediment from San Gabriel Reservoir. The sediment within the reservoir will be removed by dry excavation and transported to the Burro Canyon sediment placement site using either trucks and/or conveyors. Any individual or combination of these two methods may be used in order to remove the targeted amount of sediments in a five-year contract period.

Implementation of Strategic Plan Goals

This project is consistent with the County Strategic Plan Goal of Service Excellence and Children and Families' Well-Being, since it will provide necessary flood protection for businesses and residents downstream of the project area.

FISCAL IMPACT/FINANCING

The estimated construction cost is in the range of $40,000,000 and $60,000,000.

The contract will cover a period of five years, subject to the availability of funds for the second through fifth years. The estimated first year cost is $10,000,000. The second through fifth year annual costs are in the range of $8,000,000 to $10,000,000.

There will be no impact to the County's General Fund. Sufficient funds for the first year of this contract will be made available in the Fiscal Year 2003-04 Flood Control District budget by delaying other projects and by appropriating existing designations.

FACTS AND PROVISIONS/LEGAL REQUIREMENTS

The SEIR evaluates the environmental impacts associated with the emergency post-fire cleanout of San Gabriel Reservoir and provides additional information regarding major cleanouts of San Gabriel Reservoir that was not included in the CEIR. Certification of the SEIR is required by CEQA prior to your Board's approval of the project. Upon approval of the project, the Board must also adopt the findings, statement of overriding considerations, and mitigation monitoring and reporting program.

The enclosed plans and specifications include the contractual provisions, methods, and material requirements necessary for this project. The contract agreement will be in the form previously approved by County Counsel.

As required by your Board, language has been incorporated into the project specifications stating that the contractor shall notify its employees, and shall require each subcontractor to notify its employees that they may be eligible for the Federal Earned Income Credit under the Federal income tax laws.

ENVIRONMENTAL DOCUMENTATION

SEIR

On May 2, 2003, Public Works circulated a Notice of Preparation for the draft SEIR to the State Clearinghouse; the County Clerk; appropriate Federal, State, regional and local governmental agencies; and to various stakeholders and organizations. A Notice of Availability of the Draft SEIR was published pursuant to Section 21092 of the Public Resources Code in the San Gabriel Valley Tribune on July 10, 2003. A second notice was printed in the San Gabriel Valley Tribune on July 30, 2003. In addition, Public Works provided copies of the Draft SEIR for public review at the Azusa City Library and at Public Works' library. The draft SEIR was completed and forwarded to the State Office of Planning and Research on July 17, 2003. Copies of the Draft SEIR were provided directly to various Federal, State, and local government agencies, as well as interested organizations.

The public review and comment period commenced on July 17, 2003, and ended on September 5, 2003. Comments were received during the public review process from the following entities: U.S. Forest Service, California State Department of Transportation, San Gabriel River Water Committee, Regional Water Quality Control Board, and Main San Gabriel Basin Watermaster.

Throughout the development of the SEIR, Public Works maintained regular communications with Federal and State regulatory agencies, various special interest groups, and individuals. Their input and concerns have been addressed. The SEIR includes the comments received during the public review period of the Draft SEIR and responses to those comments.

Findings of Fact and Statement of Overriding Considerations and Mitigation Monitoring and Reporting Program

The SEIR determined that the project would not have any significant impacts related to energy and natural resources and thus no mitigation measures had to be imposed on the project regarding these two impacts. The SEIR also determined that the project would not have any significant cumulative impacts, and thus no mitigation measures had to be imposed relative to cumulative impacts.

The SEIR determined that the project is expected to result in significant environmental impacts on 9 of the 11 environmental areas unless mitigation measures are incorporated as part of the project to mitigate or avoid those significant impacts. The 9 environmental areas include earth resources, air quality, water quality, biology, noise, transportation, public services/utilities, recreation/aesthetics/socioeconomics, and cultural resources.

Mitigation measures have been identified in the SEIR to mitigate, reduce, or avoid potentially significant effects on the environment from the proposed project and are recommended as a condition of approval of the proposed project. The Mitigation Monitoring and Reporting Program has been prepared to ensure that the mitigation measures identified as a condition of the proposed project are implemented.

The identified mitigation measures are sufficient to reduce the impacts of the proposed project to a level of less than significant for earth resources, water quality, biology, noise, transportation, public services/utilities, recreation/aesthetics/socioeconomics, and cultural resources. However, even after mitigation, it has been determined that the proposed project would still have a potential significant impact on earth resources (topography) and air quality.

The Findings of Fact and Statement of Overriding Considerations set forth the specific reasons supporting the County's balancing of the economic, legal, social, technological, and other benefits of the project against its unavoidable environmental risks, as required by State CEQA Guidelines Section 15093, and these reasons support the County's decision to accept the unavoidable environmental effects associated with the project.

It has been determined that public safety and the economic benefits to the public of implementing the project outweigh and override the unavoidable adverse effects due to the project. The benefits of the project, when balanced against all adverse effects, cause those effects remaining after mitigation to be acceptable due to the need to protect life and property in the many communities downstream of the dam. We are recommending that your Board approve the proposed project and adopt the enclosed Findings of Fact and Statement of Overriding Considerations stating that the remaining significant effects on the environment found to be unavoidable are acceptable due to the overriding benefits set forth in the Statement of Overriding Considerations.

A fee must be paid to the California Department of Fish and Game when certain notices required by CEQA are filed with the County Clerk. Upon approval of the SEIR by your Board, Public Works will submit $850 to the County Clerk for this fee. In addition, a $25 handling fee will be paid to the County Clerk for processing. A Notice of Determination

will be filed within five working days after project approval (CEQA Guidelines, Sections 15094 and 15112).

CONTRACTING PROCESS

This project will be contracted on an open competitive bid basis. The contract will be awarded to the lowest responsible bidder meeting the criteria established by your Board and the California Public Contract Code.

To increase contractor awareness of our program to contract work to the private sector, this project will be listed on the County website for upcoming bids.

The project specifications contain provisions 1) requiring the contractor to comply with the County's Child Support Compliance Program, 2) requiring the contractor to report solicitations of improper consideration by County employees and allowing the County to terminate the contract if it is found that the contractor offered or gave improper consideration to County employees, 3) requiring the contractor to comply with the requirements of the County's Contractor Employee Jury Service Program, and 4) requiring the contractor to comply with the Newborn Abandonment Law (Safely Surrendered Baby Law).

The project specifications also contain a provision that, should the contractor require additional or replacement personnel to fill employment openings, consideration shall be given to hiring qualified participants in the County's Greater Avenues for Independence or General Relief Opportunities for Work Programs.

To ensure that the contract is awarded to a responsible contractor with a satisfactory history of performance, bidders are required to report violations of the False Claims Act, their civil litigation history, and information regarding prior criminal convictions. The information reported will be considered before making a recommendation to award.

IMPACT ON CURRENT SERVICES (OR PROJECTS)

The project is to be completed in approximately five years. It is estimated that the work will start in June 2004 and be completed in November 2008. Since the sediment must be removed while the reservoir is drained, the work will be performed during the dry season. Because of the remote location of the reservoir, no residents or businesses will be impacted. Disruption of recreational facilities will be minimal.

CONCLUSION

Please return one approved copy of this letter to Public Works.

Respectfully submitted,

JAMES A. NOYES
Director of Public Works

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Enc.

cc: Chief Administrative Office
County Counsel
Office of Affirmative Action Compliance

SAN GABRIEL DAM AND RESERVOIR POST-FIRE SEDIMENT REMOVAL
INSTRUCTION SHEET FOR PUBLISHING LEGAL ADVERTISEMENT

From: Department of Public Works
Construction Division

PUBLISHING

In accord with Section 20991 of the Public Contract Code.

Publish: At least five or more times prior to the date set for opening bids, in a daily newspaper of general circulation printed and published in the County and designated by the Board, or for at least two times prior to such date in a weekly newspaper printed and published in the County and designated by the Board.

Time Limitation: To open bids in nine weeks.

NOTICE INVITING BIDS

Sealed Bids will be received by the County of Los Angeles Department of Public Works, Construction Division, for the for the removal and disposal of sediment, organic material, and trash from a reservoir under Project ID No. WRDD000011, San Gabriel Dam and Reservoir Post-Fire Sediment Removal, in the Angeles National Forest.

The Bids must be submitted at the Cashier's Office, west side of main lobby, 900 South Fremont Avenue, Alhambra, California 91803-1331, before 11 a.m. on Tuesday, December 23, 2003. The Bids will then be publicly opened and read in Conference Room A or at the location posted in the main lobby.

The Work shall be done in accordance with the Plans and Specifications on file and open for inspection at the County Board of Supervisors Executive Office and the Department of Public Works. The Work is estimated to cost between $40,000,000 and $60,000,000 and shall be completed in 725 working days over a period of five years. Funding for this Contract is as described in Subsection 2-1 of the Special Provisions. The Work requires a Class A contractor's license. Prebid questions regarding the Plans and Specifications should be directed to Ms. Margaret Terrell via fax only at (626) 458-7827.

Two mandatory prebid meetings for this Contract will be held on Thursday, November 6, 2003, and Thursday, December 4, 2003. Each meeting will be at 1 p.m. Attendees shall gather at San Gabriel Canyon Spreading Grounds, located off of Highway 39/San Gabriel Canyon Road just north of Mirador Drive. Thomas Guide Page 568-H2. Transportation to the meeting site will be provided. Attendance at both meetings is mandatory for award of the Contract. Project Managers or estimators are strongly recommended to attend the meeting.

The Bids must be submitted on the Proposal forms included in the Bidder's package of the Contract Documents, which may be purchased for $15 if picked up at the aforementioned Cashier's Office, (626) 458-6959, Monday through Thursday between 7 a.m. and 5:30 p.m., or for $19 if mailed, which includes postage and handling.

Each Bid must be accompanied by a certified check, cashier's check, or surety bond payable to Los Angeles County in an amount equal to at least 10 percent of the Bid to guarantee that the Bidder will enter into the Contract if it is so awarded.

All persons performing the Work shall be paid not less than the General Prevailing Wage Determination made by the Director of Industrial Relations pursuant to the California Labor Code. Copies of these wage rates are available at the Department of Public Works.

The Bid must provide full disclosure of False Claims Act violations and civil/criminal legal actions as provided for on the three forms included as part of the Proposal. Failure to complete these forms may result in a determination that the Bidder is nonresponsive and/or not responsible.

The Contract, if awarded, will be awarded to the lowest responsive and responsible Bidder; however, the Board of Supervisors reserves the right to reject any and all bids.

A responsible Bidder is a Bidder who has demonstrated the attribute of trustworthiness, as well as quality, fitness, capacity, and experience to satisfactorily perform the Contract. It is the County's policy to conduct business only with responsible contractors.

The successful Bidder will be required to submit a faithful performance bond, payment bond, liability insurance, and workers' compensation insurance with the Contract.

As provided for in Section 22300 of the California Public Contract Code, the Contractor may substitute securities for any monies withheld by the Department of Public Works to ensure performance under the Contract or enter into an escrow agreement for payment of such monies to an escrow agent.

Each person by submitting a response to this Notice Inviting Bids certifies that such Bidder and each County lobbyist and County lobbying firm, as defined by Los Angeles County Code Section 2.160.010, retained by the bidder, is in full compliance with Chapter 2.160 of the Los Angeles County Code.

Para mas informacion con relacion a esta noticia, por favor llame a este numero (626) 458-3118. Nuestras horas de oficina son de 7 a.m. a 5 p.m. de Lunes a Jueves.

The County supports and encourages equal opportunity contracting.

By order of the Board of Supervisors of the County of Los Angeles, State of California.

Dated October 21, 2003.

Violet Varona-Lukens
Executive Officer
of the Board of Supervisors

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ENCLOSURE A

FINAL SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT
SAN GABRIEL CANYON SEDIMENT MANAGEMENT PLAN

EXECUTIVE SUMMARY

INTRODUCTION

The Los Angeles County Department of Public Works submits this Final Supplemental Environmental Impact Report (SEIR) for the San Gabriel Sediment Management Plan (project) to the County of Los Angeles (County), the lead agency for the project. The SEIR consists of the Draft Supplemental EIR (DSEIR), comments on the DSEIR, responses to the significant environmental points raised by commentators, other information added by the Department and a list of persons, organizations and public agencies commenting on the DSEIR. (State CEQA Guidelines § 15132.) The SEIR provides supplemental information regarding major sediment cleanouts in San Gabriel Reservoir, identified as "Alternative No. 5". Major cleanouts are triggered by excessive sediment deposition in the reservoir from storm water flows. Sediment deposition increases the probability of downstream flooding in major rainfall events.

PROJECT LOCATION AND GENERAL SETTING

The project area is located within the Angeles National Forest in the vicinity of San Gabriel Dam. The project reaches from San Gabriel Dam up into Burro Canyon. Burro Canyon will be used as the sediment placement site for material excavated from the reservoir.

PROJECT PURPOSE AND DESCRIPTION

The purpose of the emergency cleanout of sediment in San Gabriel Reservoir is to meet the flood control capacity requirements of the Los Angeles County Drainage Area (LACDA) system, recent improvements to which were based on the U.S. Army Corps of Engineers LACDA Study's assumed capacities for reservoirs in the San Gabriel Mountains, including San Gabriel Reservoir.

Description

The SEIR provides information necessary to update the CEIR to cover an emergency major cleanout of San Gabriel Reservoir. The removal methods in the CEIR analyzed routine cleanouts. The alternatives included excavation and trucking or conveying the sediment to Burro Canyon SPS, or sluicing the sediment to Morris Reservoir. The CEIR proposed a maximum removal of 8.4 MCY over a 2 year-period for a major cleanout. (CEIR, Appendix G, p. 6-2.)

There is a significant possibility of increased sediment deposition as a result of the Williams and Curve Fires. To provide adequate flood protection, Public Works proposes to remove a total of 5 – 12 MCY of sediment from San Gabriel Reservoir

within the next five years. The removed sediment will be placed at the Burro Canyon Sediment Placement Site. The volume of sediment removed from the reservoir is dependent on sediment deposition during the cleanout operation and the method of sediment removal.

The proposed project analyzed in the SEIR is Alternative 5 and as analyzed is a combination of sluicing/conveying/trucking for major cleanouts. Alternative 5 combines the impacts and mitigation measures for the three individual cleanout methods. The environmental impacts will be dependent upon the amount of sediment removed by each method. However, on the basis of comments to the SEIR and other factors, the County has eliminated that part of the project that called for sluicing to Morris Reservoir.

NOTE: The SEIR includes information in italics from the CEIR to facilitate its review only. The information provided in italics is not to be reviewed as part of the SEIR, but only as background and reference information from the CEIR. The SEIR provides additional new information in plain text regarding the environmental impacts of trucking and conveying sediment to Burro Canyon SPS from San Gabriel Reservoir and discusses mitigation measures for the trucking and conveying alternatives.

The project will be completed in two phases.

Phase 1

Phase 1 of the sediment removal project requires drawing the reservoir down to minimum pool and removing all deposited sediment above the minimum pool level. Phase 1 is expected to be completed in one to three years.

Phase 2

Phase 2 of the sediment removal project requires draining the reservoir completely and removing sediment deposited in the portion of the reservoir normally covered by the minimum pool. The contractor will remove as much sediment from the reservoir as possible during the remaining contract period.

One of two events will trigger implementation of Phase 2 of the sediment removal project at San Gabriel Reservoir. These events are described below:

Event A – Successful Completion of Phase 1

When the contractor finishes removing all sediment above the minimum pool footprint, the fish will be removed from the reservoir and the reservoir will be completely drawn down.

Event B – Sediment Build-Up at Outlet Tower

Sediment build-up around the outlet tower jeopardizes flood control operations. Phase 2 will be implemented if the sediment build-up around the outlet tower reaches an

elevation of 1300 feet above mean sea level. Sediment deposition to this level will require immediate sediment removal in order to protect the dam outlet structures. Sediment levels will be monitored at the outlet tower. If sediment reaches the 1300 foot level, the reservoir will be drawn down and the sediment threatening the outlet tower will be removed.

PROJECT OBJECTIVES

The Curve and Williams Fires of August - October 2002 burned over 58,000 acres, primarily in the Angeles National Forest. The two fires burned over 30 percent of the watershed tributary to San Gabriel Dam and Reservoir. The burned watershed has the potential to deposit significant amounts of sediment in San Gabriel Reservoir.

Insufficient rainfall since 1999 has prevented routine sediment sluicing to cleanout San Gabriel Reservoir in accordance with the CEIR. Sediment deposition has exceeded the 3.2 MCY limit which triggers a major cleanout and the burned watershed greatly increases the watershed potential to produce sediment. Sediment must be removed to meet flood control requirements determined by the U.S. Army Corps of Engineers Los Angeles Drainage Area (LACDA) Study.

The routine SMP regime at San Gabriel Reservoir is sluicing. The amount of sediment that can be sluiced depends on the availability and magnitude of reservoir inflow. As a result, it is not known from one year to the next if sluicing can be employed. Inflows into the reservoir since 1999 have been insufficient to initiate sluicing operations. Implementation of sluicing alone to remove the volume of sediment necessary for the emergency cleanout may not be feasible.

Excavating and transporting sediment to Burro Canyon SPS is independent of storm season runoff.

PROJECT ALTERNATIVES

The SEIR provides additional information regarding sediment removal under emergency situations. These conditions require more flexibility than routine sediment removal projects. Five alternative plans including the proposed project (Alternative 5) were studied for major cleanouts of San Gabriel Reservoir. Each plan consists of sediment removal methods and disposal sites. The plan alternatives are found in Table ES-1. A modified Alternative 5 is the proposed project because it allows the most flexibility in dealing with the emergency situation. Alternative 5 is a combination of removal methods. Initially, sluicing sediment to Morris Reservoir was considered as part of the alternative, along with dry excavation and trucking or conveying sediment to Burro Canyon SPS. Comments received from stakeholders and regulatory agencies state opposition to sluicing. Staff recommends that the Board adopt Alternative 5 with no sluicing as the proposed project for the post-fire sediment removal at San Gabriel Reservoir.

Table ES-1
Plan Alternatives

No.	Removal Methods	Disposal Site
1	No Project	No Action
2	Sluicing	Morris Reservoir
3	Excavate and Convey	Burro Canyon SPS
4	Excavate and Truck	Burro Canyon SPS
5	Excavate with Trucking and Conveying	Burro Canyon SPS

Alternative 1 – No Project

With this alternative, the circumstances are those under which the project does not proceed, thus no action would be taken at San Gabriel Reservoir to remove sediment. The project site would remain in its existing state and sediment would continue to deposit in the reservoir. This deposition will eventually render the dam inoperable. Loss of storage capacity will lead to increased flooding in downstream areas.

Alternative 2 – Sluicing to Morris Reservoir

Sluicing to Morris Reservoir is the designated routine maintenance sediment removal method. However, stakeholders and regulatory agencies oppose subsequent sluicing out of Morris Reservoir. Consequently, sluicing as the means of post-fire sediment removal from San Gabriel Reservoir would result in the sluiced sediment remaining in Morris Reservoir. Sluicing to Morris Reservoir will result in the loss of storage capacity for water used to recharge the San Gabriel Valley. The quality of water taken by the Committee of Nine will also be degraded during the sluicing operation. Water quality will be monitored and if turbidity exceeds 10 NTU, the water treatment plants of the Committee of Nine will be notified.

Alternative 3 – Convey to Burro Canyon SPS

This alternative requires mechanical excavation of material and conveying the sediment to the Burro Canyon SPS. The conveyor belt will run under the East Fork Road through a culvert and along the Burro Canyon access road. The reservoir will be drawn down and excavation will take place in two phases as described above.

Alternative 4 – Truck to Burro Canyon SPS

This alternative requires mechanical excavation of material and trucking to the Burro Canyon SPS. In order to minimize impacts to traffic, an earthen ramp must be constructed to reduce truck travel time on the highways. Two-way traffic will not be possible unless the Burro Canyon access road is widened. The reservoir will be drawn down and excavation will take place in two phases as described above.

Alternative 5 – (Modified) Proposed Project: Conveying and Trucking Combination

This alternative as analyzed in the SEIR is a combination of all of the above alternatives. The impacts of this alternative are assumed to be the full impacts from each of the alternatives. However, on the basis of comments to the SEIR and other factors regarding the secondary impacts of sluicing Public Works recommends that the County eliminate that part of the project that called for sluicing to Morris Reservoir. As revised to exclude sluicing, this alternative is proposed because it provides the most flexibility in dealing with the emergency situation. A combination of dry excavation with trucking and conveying to Burro Canyon will be used for all sediment removal.

ENVIRONMENTAL CONSEQUENCES

Significant impacts and proposed mitigation measures for the plan alternatives are described in Sections 4 through 7 of the Draft SEIR. Table ES-2 contains impact and mitigation measures for all of the proposed alternatives. Section 2 of this SEIR contains the comment letters to the Draft SEIR. Responses to those comments are set forth in Section 3 of this SEIR. Section 4 of this SEIR contains changes and corrections to the Draft SEIR. Section 5 lists the preparers of this SEIR. Significant impacts that cannot be completely avoided, eliminated, or reduced to a less than significant level are listed below. Impacts and issues of particular concern to commentators on the Draft SEIR that have been found to be less than significant are also listed.

Significant Impacts Remaining After Mitigation

Air Quality. ROG, NO_x and PM_{10} will be exceeded at San Gabriel Reservoir during the project. Application of mitigation measures will reduce, but not eliminate the impacts, resulting in a significant, unavoidable impact on air quality.

Impacts Determined to be Less Than Significant After Mitigation

Earth Resources. Trucking to Burro Canyon requires widening the road to allow two-directional traffic of large trucks. Widening the road requires cutting the canyon wall and/or filling the canyon bottom. Cutting the wall could lead to slope instability problems that could slow sediment removal and cause hazards. (SEIR, p. 95.) These impacts can be reduced to a less than significant level if the following procedures are implemented.

- Access road slope stability will be ensured using sound engineering principles based upon geotechnical recommendations. (SEIR, p. 125.)
- Standard County procedures will be used in compacting fill material. (SEIR, p. 125; The 2003 Edition of the Standard Specifications for Public Works Construction ("Greenbook").)

Water Quality. Increased turbidity, temperature and dissolved oxygen may be reduced to less than significant levels during dry excavation by implementing best

management practices (BMPs) and adjusting reservoir operation. The impacts of modified Alternative 5 will be mitigated by mitigation measures already adopted at the time the CEIR was certified. In addition, the impacts can be reduced to a less than significant level if the following procedures are implemented:

- Develop and implement Best Management Practices within the reservoir to ensure turbidity values are acceptable for the water users. Such practices shall include one or more of the following: (1) When work in a flowing stream is unavoidable, divert the entire stream flow around the work area by barriers, temporary culverts, new channels, or other means. (2) Construct channel banks or barriers to prevent seepage into or from the work area. (3) Utilize materials that will not introduce pollutants into the water, such as onsite alluvium of low silt content, inflatable dams, sand bags, or other appropriate materials. (4) Enclose any earthen channel banks or barriers with protective materials such as sheet piling, rock rip-rap or other appropriate materials.

- Develop and implement a program to monitor turbidity in and below the reservoir. Ongoing sampling during the project will be used to determine the extent of the parameter variation during sediment removal operations. Data from the sampling shall be analyzed to determine if there are any correlation between those parameters and biological monitoring data. This program shall include one or more of the following to reach the performance standard: (1) Use sandbags to build settling ponds. (2) Reduce agitation or adjust release flow rate. (3) Isolate the work site and diverting water around the work area using barriers, temporary culverts, or new channels. (4) Prevent silt and other deleterious materials from migrating to downstream reaches through the placement of silt fencing, straw bales, sand bags, and/or construction of silt catchment basins

Biology. Temporary loss of fisheries was analyzed in the CEIR and may be mitigated to less than significance by transferring the fish to six locations specified by CDFG before beginning Phase 2 drawdown. These locations are specified on page 8-8 of the CEIR and include: Santa Fe Dam, Puddingstone Lake, Peck Road Lakes, Legg Lakes, Lake Evans and the East Fork of the San Gabriel River.

The species of concern (Santa Ana sucker, Santa Ana speckled dace and arroyo chub) will not be removed during this project since they do not inhabit reservoirs, but inhabit streams instead. As a result, fish nets are proposed to keep the species of concern out of the construction area. Based on past experience, the fish in San Gabriel Reservoir are non-native. These non-native fish will be relocated to Santa Fe Dam, Puddingstone Lake, Peck Road Lake, Legg Lake, and Lake Evans. Any native fish shall be relocated to the East Fork. The non-native fish have historically been harvested from San Gabriel and Morris Reservoirs to provide fish to these six sites when the reservoirs had to be drained for sediment removal. Fish harvesting from San Gabriel and Morris Reservoirs is a current practice for the CDFG. The fish are a resource for replenishing fish populations in urban lakes used for recreational fishing. The six sites are stocked regularly with the same species of game fish being relocated from San Gabriel Reservoir. Placing these fish will thus not impact the receiving waters. Removal of the

game fish, which are non-native, from San Gabriel Reservoir is beneficial to the Santa Ana suckers, which are prey to the larger game fish. (50 CFR Part 17, RIN 1018-AF34 – Threatened Status for the Santa Ana Sucker, Final Rule, April 2000.)

Construction of designated stream crossings will reduce impacts to less than significant in sensitive fish species habitat. Fish nets will be used to keep sensitive fish species outside the project limits.

An access ramp from the reservoir bottom to the East Fork Road near the entrance of Burro Canyon will be constructed. The access ramp shall be located at and near the existing conveyor access ramp and away from the East Fork streambed that contains habitat for the sensitive fish species, including the Santa Ana sucker. The access ramp will remove upland habitat.

Trucking into Burro Canyon will require the widening of the existing access road to accommodate two-way traffic. Cutting into the existing hillside adjacent to the west side of the road is not advisable, so the streambed adjacent to the east side of the road will have to be filled. Upland and riparian habitat will be removed.

In 1998 Public Works initiated the invasive species removal program to mitigate for the permanent habitat degradation associated with routine, bienniel sluicings of San Gabriel Reservoir (0.8 acres) and Morris Reservoir (62 acres) under the San Gabriel Canyon Sediment Management Plan. The CEIR described the details of the invasive species removal program. Public Works engaged the U.S. Forest Service to undertake the work. Since the certification of the CEIR, Public Works was only able to perform one sluicing operation, that at Morris Reservoir ~~since~~ in 1998. However, the invasive species removal program is ongoing. By 2001 the habitat downstream of Morris Dam not only recovered but exceeded pre-sluice levels. As a result, Public Works is currently mitigating for a permanent sluicing impact that did not occur. The ongoing invasive species removal project shall be used for mitigation of the riparian and upland habitat removed by the project. Isolating the work area, constructing desilting basins and culverts, restricting entry to the project site, and proper storage of materials, will mitigate biological degradation from toxics.

In addition, the impacts can be reduced to a less than significant level if the following procedures are implemented:

- Relocate the Southwestern pond turtle and two-striped garter snake during Phase 2 of the project to the West, North and East Forks of the San Gabriel River and/or to ponds below the San Gabriel Dam. Conduct population counts of both species at each relocation area annually for three years following relocation, and then every five years thereafter.

- Install a limited number of stream crossing ramps on the East Fork to access the constructed ramp and conveyor area and avoid damage to the Santa Ana sucker's habitat.

Noise. Construction workers will be subjected to high levels of noise from heavy equipment operation in the project area. Cal-OSHA regulations will be implemented to protect workers from high noise levels.

Transportation and Energy. Trucking will impact traffic on the East Fork Road. This impact will be reduced to less than significant by constructing an earthen ramp from the reservoir bottom to near the entrance to Burro Canyon so that only the crossing area will be affected by traffic. In addition, work schedules shall be restricted to Monday through Friday, and the access road to Burro Canyon shall be widened to allow two-way traffic access to and from the canyon and sediment placement site.

Public Services/Utilities. The water tank used for fire suppression may be impacted in the future by sediment placement activities. Moving the water tank when sediment placement occurs within 5 feet of the water tank will mitigate this impact.

Recreation/Aesthetics/Socioeconomics. Access to the shooting range in Burro Canyon will be impacted and mitigated through construction of the earthen ramp. Loss of aesthetic viewsheds at San Gabriel Reservoir and Burro Canyon SPS will occur during the project. The new sediment fill in Burro Canyon SPS will be revegetated after the project is completed to minimize aesthetic impacts. The reservoir will be filled to minimum pool or above to mitigate the viewshed impacts at San Gabriel Reservoir. Operations will be limited to weekdays, avoiding the peak recreational traffic into Burro Canyon.

Cultural Resources. Possible damage to the masonry tunnel near Burro Canyon may be seen as an impact. The masonry tunnel was determined to have no National Historic Register significance. However, photographic documentation will be required before project implementation and restoration of damage to original condition will be required.

PROPOSED PROJECT

The proposed project is the modified Alternative 5 that excludes sluicing and includes conveying and trucking. This alternative is proposed to allow more flexibility in sediment removal. Flexibility is necessary due to the emergency nature of the sediment removal project and the need to provide flood protection.

Table ES-2

Significant Adverse Impacts and Mitigation Measures for Plan Alternatives

San Gabriel: Disposal Site:	5[1] Convey/Truck Burro Canyon SPS	1 No Project	2 Sluice Morris Reservoir	3 Conveyor Belt Burro Canyon SPS	4 Truck Burro Canyon SPS
EARTH RESOURCES					
Impact from Seismicity:[2]	Earthquake may damage conveyor at Burro SPS. Topography at Burro Canyon would be altered	Sediment fill would permanently alter topography of San Gabriel Reservoir	Sediment fill would permanently alter topography of Morris Reservoir	Earthquake may damage conveyor at Burro SPS. Topography at Burro Canyon would be altered	Earthquake may damage Burro Canyon SPS. Topography at Burro Canyon would be altered
Mitigation Measure:[3]	Compact fill in accordance with specifications.	None	None	Compact fill in accordance with specifications.	Compact fill in accordance with specifications.
Impact After Mitigation:	Less Than Significant	Significant	Significant	Less Than Significant	Less Than Significant
Impact from Erosion:	Erosion may cause failure in Burro Canyon SPS.	None	None	Erosion may cause failure in Burro Canyon SPS.	Erosion may cause failure in Burro Canyon SPS.
Mitigation Measure:	Properly prepare site, place drains, compact fill.	None	None	Properly prepare site, place drains, compact fill.	Properly prepare site, place drains, compact fill.
Impact After Mitigation:	Less Than Significant	None	None	Less Than Significant	Less Than Significant

[1] Alternative 5 originally considered sluicing as part of the sediment removal combination. Regulatory agencies and stakeholders opposed sluicing. Sluicing is removed as an alternative for this major post-fire sediment removal project.

[2] The impacts listed in each resource area are summaries of the full impact.

[3] The mitigation measures listed in each resource area are summaries of the full mitigation measures.

Table ES-2 (Continued)

Significant Adverse Impacts and Mitigation Measures for Plan Alternatives

San Gabriel: Disposal Site:	5[1] Convey/Truck Burro Canyon SPS	1 No Project	2 Sluice Morris Reservoir	3 Conveyor Belt Burro Canyon SPS	4 Truck Burro Canyon SPS
EARTH RESOURCES (Continued)					
Impact from Sediment Contamination:	None	None	None	None	None
Mitigation Measure:	None	None	None	None	None
Impact After Mitigation:	None	None	None	None	None
Impact from Roadway Construction	Slope instability from cutting to create roadway	None	None	None	None
Mitigation Measure	Access road slope stability will be ensured using sound engineering principles based on geotechnical recommendations.	None	None	None	None
AIR QUALITY					
Impact from Criteria Pollutants and Dust:	ROG, NO_x and PM_{10} exceeded at San Gabriel Reservoir.	None	NO_x criteria exceeded at San Gabriel Reservoir.	ROG, NO_x and PM_{10} exceeded at San Gabriel Reservoir.	NO_x exceeded at San Gabriel Reservoir.
Mitigation Measure:	Maintain equipment, discontinue activities during Stage II smog alerts; use water trucks to control dust.	None	Maintain equipment, discontinue activities during Stage II alerts.	Maintain equipment, discontinue activities during Stage II smog alerts; use water trucks to control dust.	Maintain equipment, discontinue activities during Stage II smog alerts; use water trucks to control dust.

[1] Alternative 5 originally considered sluicing as part of the sediment removal combination. Regulatory agencies and stakeholders opposed sluicing. Sluicing is removed as an alternative for this major post-fire sediment removal project.

Table ES-2 (Continued)

Significant Adverse Impacts and Mitigation Measures for Plan Alternatives

San Gabriel: Disposal Site:	5[1] Convey/Truck Burro Canyon SPS	1 No Project	2 Sluice Morris Reservoir	3 Conveyor Belt Burro Canyon SPS	4 Truck Burro Canyon SPS
AIR QUALITY (Continued)					
Impact After Mitigation:					
Project Area:	Significant	None	Significant	Significant	Significant
Wilderness Area:	None	None	None	None	None
WATER QUALITY					
Impact of Flooding:	None	Storms would frequently flood communities above and below Santa Fe Basin.	None	None	None
Mitigation Measure:	None	None	None	None	None
Impact After Mitigation:	None	Significant	None	None	None
Impact of Spills:	Spills of hydrocarbons could contaminate waterways in and below San Gabriel Reservoir.	None	Spills of hydrocarbons could contaminate waterway in and below San Gabriel Reservoir.	Spills of hydrocarbons could contaminate waterway in and below San Gabriel Reservoir.	Spills of hydrocarbons could contaminate waterways in and below San Gabriel Reservoir.
Mitigation Measure:	Maintain machinery, develop spill control plan.	None	Maintain machinery, develop spill control plan.	Maintain machinery, develop spill control plan.	Maintain machinery, develop spill control plan.
Impact After Mitigation:	Less Than Significant	None	Less Than Significant	Less Than Significant	Less Than Significant

[1] Alternative 5 originally considered sluicing as part of the sediment removal combination. Regulatory agencies and stakeholders opposed sluicing. Sluicing is removed as an alternative for this major post-fire sediment removal project.

Table ES-2 (Continued)

Significant Adverse Impacts and Mitigation Measures for Plan Alternatives

San Gabriel: Disposal Site:	5[1] Convey/Truck Burro Canyon SPS	1 No Project	2 Sluice Morris Reservoir	3 Conveyor Belt Burro Canyon SPS	4 Truck Burro Canyon SPS
WATER QUALITY (Continued)					
Impact in Reservoirs:	Temperature increase in Morris (temporary).	Temperature increase in all three reservoirs (permanent).	Temperature increase in Morris (permanent).	Temperature increase in Morris (temporary)	Temperature increase in Morris (temporary)
Mitigation Measure:	None	None	None	None	None
Impact After Mitigation:	Less Than Significant	Significant	Significant	Less Than Significant	Less Than Significant
Impact below Reservoirs:	Increased turbidity, etc. below San Gabriel.	Increased temp. below San Gabriel until filled.	Increased turbidity, decreased DO, below San Gabriel.	Increased turbidity, etc. below San Gabriel.	Increased turbidity, etc. below San Gabriel.
Mitigation Measure:	Monitor turbidity; employ BMPs. Alert Committee of Nine of increased turbidity.	None	Monitor turbidity, etc. at San Gabriel. Alert Committee of Nine of increased turbidity.	Monitor turbidity, employ BMPs. Alert Committee of Nine of increased turbidity.	Monitor turbidity; employ BMPs. Alert Committee of Nine of increased turbidity.
Impact After Mitigation:	Less Than Significant	Significant	Significant	Less Than Significant	Less Than Significant

[1] Alternative 5 originally considered sluicing as part of the sediment removal combination. Regulatory agencies and stakeholders opposed sluicing. Sluicing is removed as an alternative for this major post-fire sediment removal project.

Table ES-2 (Continued)

Significant Adverse Impacts and Mitigation Measures for Plan Alternatives

San Gabriel: Disposal Site:	5[1] Convey/Truck Burro Canyon SPS	1 No Project	2 Sluice Morris Reservoir	3 Conveyor Belt Burro Canyon SPS	4 Truck Burro Canyon SPS
WATER QUALITY (Continued)					
Impact on Water Supply:	None	Loss of 50,000 acre-feet for groundwater recharge.	Loss of 13,000 acre-feet for groundwater recharge.	None	None
Mitigation Measure:	None	None	None	None	None
Impact After Mitigation:	Less Than Significant	Significant	Significant	Less Than Significant	Less Than Significant
Impact on Groundwater Quality:	None	None	None	None	None
Mitigation Measure:	None	None	None	None	None
Impact After Mitigation:	None	None	None	None	None
Impact on Water Users:	Turbidity in San Gabriel would reduce water quality in Azusa Conduit and Duarte Intake, adversely affecting Committee of Nine during Phase 2 drawdown.	None	Turbidity in San Gabriel would reduce water quality in Azusa Conduit and Duarte Intake, adversely affecting Committee of Nine during project.	Turbidity in San Gabriel could reduce water quality in Azusa Conduit and Duarte Intake, adversely affecting Committee of Nine during Phase 2 drawdown	Turbidity in San Gabriel could reduce water quality in Azusa Conduit and Duarte Intake, adversely affecting Committee of Nine during Phase 2 drawdown
Mitigation Measure:	Implement BMPs.	None	Reduce agitation to reduce turbidity.	Implement BMPs.	Implement BMPs.
Impact After Mitigation:	Less Than Significant	None	Less Than Significant	Less Than Significant	Less Than Significant

[1] Alternative 5 originally considered sluicing as part of the sediment removal combination. Regulatory agencies and stakeholders opposed sluicing. Sluicing is removed as an alternative for this major post-fire sediment removal project.

Table ES-2 (Continued)

Significant Adverse Impacts and Mitigation Measures for Plan Alternatives

San Gabriel: Disposal Site:	5[1] Convey/Truck Burro Canyon SPS	1 No Project	2 Sluice Morris Reservoir	3 Conveyor Belt Burro Canyon SPS	4 Truck Burro Canyon SPS
BIOLOGY					
Impact on Sensitive Plants and Animals:	Sediment and high flows released during Phase 2 would degrade habitat in Browns Gulch used by the Southwestern Pond Turtle and Two-Striped Garter Snake.	None	Sediment and high flows released would degrade habitat in Browns Gulch used by the Southwestern Pond Turtle and Two-Striped Garter Snake.	Sediment and high flows released during Phase 2 would degrade habitat in Browns Gulch used by the Southwestern Pond Turtle and Two- Striped Garter Snake.	Sediment and high flows released during Phase 2 would degrade habitat in Browns Gulch used by the Southwestern Pond Turtle and Two-Striped Garter Snake.
Mitigation Measure:	Relocation of sensitive species prior to opening sluice gate. Monitor the species for three years after relocation.	None	Relocation of sensitive species prior to opening sluice gate. Monitor the species for three years after relocation.	Relocation of sensitive species prior to opening sluice gate. Monitor the species for three years after relocation.	Relocation of sensitive species prior to opening sluice gate. Monitor the species for three years after relocation.
Impact After Mitigation:	Less Than Significant	None	Less Than Significant	Less Than Significant	Less Than Significant
Impact on Reservoir Fisheries:	Temporary fisheries loss in San Gabriel during Phase 2.	Permanent loss of fisheries in all reservoirs. Some fish would remain in tributaries.	Temporary fisheries loss in San Gabriel during complete drawdown.	Temporary fisheries loss in San Gabriel during Phase 2.	Temporary fisheries loss in San Gabriel during Phase 2.
Mitigation Measure:	Transfer fish prior Phase 2 drawdown, stock other lakes.	None	Transfer fish prior Phase 2 drawdown, stock other lakes.	Transfer fish prior Phase 2 drawdown, stock other lakes.	Transfer fish prior Phase 2 drawdown, stock other lakes.
Impact After Mitigation:	Less Than Significant	Significant	Less Than Significant	Less Than Significant	Less Than Significant

[1] Alternative 5 originally considered sluicing as part of the sediment removal combination. Regulatory agencies and stakeholders opposed sluicing. Sluicing is removed as an alternative for this major post-fire sediment removal project.

Table ES-2 (Continued)

Significant Adverse Impacts and Mitigation Measures for Plan Alternatives

San Gabriel: Disposal Site:	5[1] Convey/Truck Burro Canyon SPS	1 No Project	2 Sluice Morris Reservoir	3 Conveyor Belt Burro Canyon SPS	4 Truck Burro Canyon SPS
BIOLOGY (Continued)					
Impact on Trout:	None	None	None	None	None
Mitigation Measure:	None	None	None	None	None
Impact After Mitigation:	None	None	None	None	None
Impact on Sensitive Fish:	Stream crossings and earth ramp will impact habitat area for Santa Ana Sucker.	Loss of Santa Ana Sucker habitat as reservoir fills with sediment.	None	Stream crossings and earth ramp will impact habitat area for Santa Ana Sucker.	Stream crossings and earth ramp will impact habitat area for Santa Ana Sucker.
Mitigation Measure:	Use fish nets to keep Suckers out of construction area. Build stream crossings to avoid damage of stream. Locate ramp outside of habitat.	None	None	Use fish nets to keep Suckers out of construction area. Build stream crossings to avoid damage of stream. Locate ramp outside of habitat.	Use fish nets to keep Suckers out of construction area. Build stream crossings to avoid damage of stream. Locate ramp outside of habitat.
Impact After Mitigation:	Less Than Significant	None	None	Less Than Significant	Less Than Significant

[1] Alternative 5 originally considered sluicing as part of the sediment removal combination. Regulatory agencies and stakeholders opposed sluicing. Sluicing is removed as an alternative for this major post-fire sediment removal project.

Table ES-2 (Continued)

Significant Adverse Impacts and Mitigation Measures for Plan Alternatives

San Gabriel: Disposal Site:	5[1] Convey/Truck Burro Canyon SPS	1 No Project	2 Sluice Morris Reservoir	3 Conveyor Belt Burro Canyon SPS	4 Truck Burro Canyon SPS
BIOLOGY (Continued)					
Impact on Aquatic Habitat:	Stream crossings and earth ramp will impact habitat area in reservoir.	Loss of habitat as reservoir fills	None	Stream crossings and earth ramp will impact habitat area in reservoir.	Stream crossings and earth ramp will impact habitat area in reservoir.
Mitigation Measure:	Use fish nets to keep fish out of construction area. Build stream crossings to avoid damage of stream. Locate ramp outside of habitat.	None	None	Use fish nets to keep fish out of construction area. Build stream crossings to avoid damage of stream. Locate ramp outside of habitat.	Use fish nets to keep fish out of construction area. Build stream crossings to avoid damage of stream. Locate ramp outside of habitat.
Impact After Mitigation:	Less Than Significant	Significant	None	Less Than Significant	Less Than Significant
Impact from Toxics:	Biological degradation from sediments, toxics from San Gabriel.	None	Biological degradation from sediments, toxics from San Gabriel.	Biological degradation from sediments, toxics from San Gabriel.	Biological degradation from sediments, toxics from San Gabriel.
Mitigation Measure:	Isolate work area, construct basin, culverts, restrict entry, proper storage.	None	Isolate work area, construct basin, culverts, restrict entry, proper storage.	Isolate work area, construct basin, culverts, restrict entry, proper storage.	Isolate work area, construct basin, culverts, restrict entry, proper storage.
Impact After Mitigation:	Less Than Significant	None	Less Than Significant	Less Than Significant	Less Than Significant

[1] Alternative 5 originally considered sluicing as part of the sediment removal combination. Regulatory agencies and stakeholders opposed sluicing. Sluicing is removed as an alternative for this major post-fire sediment removal project.

Table ES-2 (Continued)

Significant Adverse Impacts and Mitigation Measures for Plan Alternatives

San Gabriel: Disposal Site:	5[1] Convey/Truck Burro Canyon SPS	1 No Project	2 Sluice Morris Reservoir	3 Conveyor Belt Burro Canyon SPS	4 Truck Burro Canyon SPS
BIOLOGY (Continued)					
Impact on Terrestrial Habitat:	Loss of 7.14 acres upland habitat and 4.5 acres riparian habitat below San Gabriel.	None	Loss of 3 acres of riparian habitat below San Gabriel.	None	Loss of 7.14 acres upland habitat and 4.5 acres riparian habitat below San Gabriel.
Mitigation Measure:	11.64 acres of credits from Public Works' ongoing Invasive Species Removal Project with USFS will be used for mitigation of this impact.	None	3 acres of credits from Public Works' ongoing Invasive Species Removal Project with USFS will be used for mitigation of this impact.	None	11.64 acres of credits from Public Works' ongoing Invasive Species Removal Project with USFS will be used for mitigation of this impact.
Impact After Mitigation:	Less Than Significant	None	Less Than Significant	None	Less Than Significant
NOISE					
Impact from Construction and Excavation:	Construction workers affected by equipment noise.	None	Construction workers affected by equipment noise	Construction workers affected by equipment noise	Construction workers affected by equipment noise
Mitigation Measure:	Implement CalOSHA standards at work site.	None	Implement CalOSHA standards at work site.	Implement CalOSHA standards at work site.	Implement CalOSHA standards at work site.
Impact After Mitigation:	None	None	None	None	None

[1] Alternative 5 originally considered sluicing as part of the sediment removal combination. Regulatory agencies and stakeholders opposed sluicing. Sluicing is removed as an alternative for this major post-fire sediment removal project.

Table ES-2 (Continued)

Significant Adverse Impacts and Mitigation Measures for Plan Alternatives

San Gabriel: Disposal Site:	5[1] Convey/Truck Burro Canyon SPS	1 No Project	2 Sluice Morris Reservoir	3 Conveyor Belt Burro Canyon SPS	4 Truck Burro Canyon SPS
NATURAL RESOURCES					
Impact on uses of Sediment:	Sand and gravel at all three reservoirs would not be available for use.	Sand and gravel at all three reservoirs would not be available for use.	Sand and gravel at all three reservoirs would not be available for use.	Sand and gravel at all three reservoirs would not be available for use.	Sand and gravel at all three reservoirs would not be available for use.
Mitigation Measure:	None	None	None	None	None
Impact After Mitigation:	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant
TRANSPORTATION AND ENERGY					
Impact:	Heavy equipment use of East Canyon Road.	None	None	None	Heavy equipment use of East Canyon Road.
Mitigation Measure:	Build earth ramp and drive directly into Burro Canyon.	None	None	None	Build earth ramp and drive directly into Burro Canyon.
Impact After Mitigation:	Less Than Significant	None	None	None	Less Than Significant
PUBLIC SERVICES/UTILITIES					
Impact on Public Services:	Sediment placement near water tank in Burro Canyon.	Floods would severely impact public services above and below Santa Fe Basin.	None	Sediment placement near water tank in Burro Canyon.	Sediment placement near water tank in Burro Canyon.
Mitigation Measure:	Move water tank if placement occurs within 5 feet of tank	None	None	Move water tank if placement occurs within 5 feet of tank	Move water tank if placement occurs within 5 feet of tank
Impact After Mitigation:	Less Than Significant	Significant	None	Less Than Significant	Less Than Significant

[1] Alternative 5 originally considered sluicing as part of the sediment removal combination. Regulatory agencies and stakeholders opposed sluicing. Sluicing is removed as an alternative for this major post-fire sediment removal project.

Table ES-2 (Continued)

Significant Adverse Impacts and Mitigation Measures for Plan Alternatives

San Gabriel: Disposal Site:	5[1] Convey/Truck Burro Canyon SPS	1 No Project	2 Sluice Morris Reservoir	3 Conveyor Belt Burro Canyon SPS	4 Truck Burro Canyon SPS
RECREATION/AESTHETICS/SOCIOECONOMICS					
Impact on Fishing:	No fishing near removal operation	None	No fishing near removal operation	No fishing near removal operation	No fishing near removal operation
Mitigation Measure:	None	None	None	None	None
Impact After Mitigation:	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant	Less Than Significant
Impact on Views:	Loss of aesthetic viewsheds at San Gabriel and Burro Canyon SPS during project.	Loss of aesthetic viewshed at San Gabriel Reservoir (permanent).	Loss of aesthetic viewshed at San Gabriel Reservoir during project	Loss of aesthetic viewsheds at San Gabriel and Burro Canyon SPS during project	Loss of aesthetic viewsheds at San Gabriel and Burro Canyon SPS during project
Mitigation Measure:	Revegetate Burro Canyon SPS after project completion	None	Restore water surface elevation after project is completed.	Revegetate Burro Canyon SPS after project completion.	Revegetate Burro Canyon SPS after project completion.
Impact After Mitigation:	Less Than Significant	Significant	Less Than Significant	Less Than Significant	Less Than Significant
Impact on Socioeconomics:	None	Loss of jobs, housing; degraded social environment from flooding.	None	None	None
Mitigation Measure:	None	None	None	None	None
Impact After Mitigation:	Less Than Significant	Significant	Less Than Significant	Less Than Significant	Less Than Significant

[1] Alternative 5 originally considered sluicing as part of the sediment removal combination. Regulatory agencies and stakeholders opposed sluicing. Sluicing is removed as an alternative for this major post-fire sediment removal project.

Table ES-2 (Continued)

Significant Adverse Impacts and Mitigation Measures for Plan Alternatives

San Gabriel: Disposal Site:	5[1] Convey/Truck Burro Canyon SPS	1 No Project	2 Sluice Morris Reservoir	3 Conveyor Belt Burro Canyon SPS	4 Truck Burro Canyon SPS
CULTURAL RESOURCES					
Impact on Cultural Resources:	Possible damage to masonry tunnel near Burro Canyon access road.	None	None	Possible damage to masonry tunnel near Burro Canyon access road.	None
Mitigation Measure:	Photograph and restore to original condition if damaged.	None	None	Photograph and restore to original condition if damaged.	None
Impact After Mitigation:	Less Than Significant	None	None	Less Than Significant	None
CUMULATIVE IMPACTS					
Impact:	None	Renders LACDA improvements inadequate.	Reduced capacity in Morris Reservoir for water storage.	None	None
Mitigation Measure:	None	None	None	None	None
Impact After Mitigation:	None	Significant	Significant	None	None

[1] Alternative 5 originally considered sluicing as part of the sediment removal combination. Regulatory agencies and stakeholders opposed sluicing. Sluicing is removed as an alternative for this major post-fire sediment removal project.

SECTION 1.0 – INTRODUCTION: PURPOSE AND NEED FOR PROPOSED ACTION

1.1 INTRODUCTION

The Los Angeles County Board of Supervisors certified the Environmental Impact Report (CEIR) for the San Gabriel Canyon Sediment Management Plan (SMP) in June of 1998. The SMP details routine sediment management regimes for three dam and reservoir facilities in the San Gabriel Canyon. The facilities include Cogswell Dam and Reservoir, San Gabriel Dam and Reservoir, and Morris Dam and Reservoir. The purpose of the routine sediment removal regimes is to provide flood protection for the residents in the San Gabriel Valley and conserve water for groundwater recharge.

This Supplemental Environmental Impact Report (SEIR) adds the necessary information to the CEIR that is required to perform major cleanouts in the event of an emergency. The purpose of the major cleanout is to offset increased sediment loads and the attendant reduction in flood protection that are likely to result from the emergency condition. The Curve and Williams Fires of August – October 2002 burned over 30 percent of the watershed tributary to the San Gabriel Dam and Reservoir. The burned watershed creates an emergency condition at the facility. This emergency condition will continue until the watershed significantly recovers. The recovery period typically requires at least four to five years. The CEIR recognized the necessity of a flexible plan in dealing with emergency events due to the unpredictable nature of individual events. The sediment removal alternatives for a major cleanout of San Gabriel Reservoir discussed in the CEIR include sluicing, and dry excavation and conveyor transport to Burro Canyon Sediment Placement Site (SPS) for disposal. This SEIR adds information related to trucking sediment to Burro Canyon SPS for disposal during emergency situations.

1.2 PROJECT LOCATION AND HISTORICAL SETTING

Flood protection requires sediment removal from the reservoirs to preserve enough storage capacity to attenuate peak flows from storm water runoff. The U.S. Army Corps of Engineers' Los Angeles County Drainage Area (LACDA) Study assumed specific storage capacities in the reservoirs that are part of the San Gabriel and Los Angeles Rivers flood control system. The San Gabriel Canyon reservoirs are part of the flood control system. Improvements were made to the lower Los Angeles River and Rio Hondo flood control channels based on the LACDA Study capacities. The improvements brought the flood control channels into compliance with federal flood protection standards and allowed removal of mandatory flood insurance requirements from the communities adjacent to these channels.

The San Gabriel Dam and Reservoir is the largest and primary flood control facility in the San Gabriel Canyon. Sediment removal from the reservoir is necessary to meet the Corps' LACDA requirements. Removal of sediment deposited near San Gabriel Dam also protects the dam's outlet works by preventing entrance of sediment. Sediment can

plug the valves and prevent operation. Protection of the outlet works is critical to provide controlled storm water releases and flood protection.

Sediment that accumulates behind the dam reduces the available water storage volume within the reservoir. The reduced storage volume limits the amount of water conserved for groundwater recharge from the San Gabriel Canyon watershed. Groundwater recharge currently replenishes groundwater supplies used for drinking water in the San Gabriel Valley.

The average annual sediment inflow into San Gabriel Reservoir under normal conditions is approximately 1.1 MCY. The CEIR considered several alternatives for routine cleanouts of San Gabriel Reservoir. The methods evaluated included dredging and transport to Burro Canyon SPS or downstream past Morris Dam, excavation and transport to Burro Canyon SPS by conveyor belt, and sluicing to Morris Reservoir. Sediment sluiced into Morris Reservoir would be subsequently sluiced from Morris Reservoir into the San Gabriel River.

The CEIR approved a biennial sluicing of approximately 2.2 MCY of sediment from San Gabriel Reservoir into Morris Reservoir. However, the other alternatives were determined to be either infeasible or to have greater adverse environmental impacts than sluicing.

The CEIR also discussed major cleanouts resulting from emergency events or conditions. One major sediment event that deposits a specific sediment volume to a reservoir triggers a major cleanout. The major sediment event for San Gabriel Reservoir is 3.2 MCY. The CEIR stated that an emergency cleanout at a rate of 8.4 MCY over a two-year period might be required at San Gabriel Reservoir.

The CEIR did not propose a major or emergency cleanout project because major sediment events are unpredictable. The specific nature of the major sediment event greatly influences the proper response. The CEIR determined that conveying sediment to Burro Canyon SPS would be the most efficient means of sediment removal, transport, and disposal for a major cleanout of San Gabriel Reservoir. However, design and construction of the conveyor belt system requires a significant amount of time. The CEIR recognized that sluicing might be needed during the interim between design and construction of a conveyor belt system.

1.3 PURPOSE AND NEED FOR ACTION

1.3.1 Basic Purpose

The basic purpose for sediment removal remains the same. Sediment removal is necessary to maintain flood control capabilities and conserve water as part of operating dam and reservoir facilities in San Gabriel Canyon.

1.3.2 Need for Action at this Time

The Curve and Williams Fires of August - October 2002 burned over 58,000 acres, primarily in the Angeles National Forest. The two fires burned over 30 percent of the watershed tributary to San Gabriel Dam and Reservoir. Under burned conditions, a 5- to 10-year storm can deliver 5 MCY of sediment to the facility. The 5- to 10-year storm has a 20 to 10 percent chance, respectively, of occurring in any given year. A capital storm, with a 50-year rainfall frequency, has a 2 percent chance of occurring in any given year. The capital storm over this significantly burned watershed has the potential to deliver 14 MCY of sediment to San Gabriel Reservoir.

In contrast, under unburned conditions, a 5- to 10-year storm generates less than 2 MCY and a capital storm generates 12 MCY of sediment. The Curve and Williams Fires have created an emergency condition in the watershed. It will take at least four to five years for the watershed to significantly recover from the fires.

Public Works must remove a minimum of 5 MCY of sediment from San Gabriel Reservoir due to the fires. The sediment must be removed to protect the dam's outlet works and to meet the U.S. Army Corps of Engineers' LACDA reservoir capacity requirements. The amount of deposited sediment and the available sediment removal technologies must be considered when implementing emergency sediment removal projects.

The routine SMP regime at San Gabriel Reservoir is sluicing. The amount of sediment that can be sluiced depends on the availability and magnitude of reservoir inflow. As a result, it is not known from one year to the next if sluicing can be employed. Inflows into the reservoir since 1999 have been insufficient to initiate sluicing operations. Implementation of sluicing alone to remove the volume of sediment necessary for the emergency cleanout may not be feasible.

Excavating and transporting sediment to Burro Canyon SPS is independent of storm season runoff.

Additional factors will influence the removal, transport, and deposition alternatives employed by Public Works to remove deposited sediment during watershed recovery. The major additional factors are available funding and the ability to obtain permits.

The funding available for the Public Works sediment removal project at San Gabriel Reservoir is an important consideration in choosing cleanout alternatives. Public Works must comply with other environmental mandates within the County. It is also possible that other emergency events may occur in the County during the sediment removal period. Allocations of funds will influence sediment removal alternatives since some alternatives are less expensive than others.

Permits are required for excavation within the reservoir, disposal of sediment at Burro Canyon SPS, and the use of a conveyor belt system. Several regulatory agencies must issue permits to Public Works before the sediment removal process begins.

Trucking will be used instead of, or in addition to, conveying sediment under certain circumstances. The circumstances include not being able to acquire permits for the use of a conveyor system, permit conditions that render use of a conveyor system infeasible or inadequate to remove the required volume of sediment, or economic considerations as stated above. The design and construction of the conveyor belt system requires a significant amount of time. Therefore, if the use of a conveyor system is pursued, trucking may be employed in the interim during the design and construction of the conveyor belt system.

The current burned watershed condition has increased the potential for significant adverse impacts to the downstream communities if sediment is not removed in a timely manner. Public Works will employ the available methodologies that are capable of removing the excess sediment in order to maintain the flood control function of San Gabriel Dam and Reservoir.

1.4 PUBLIC INVOLVEMENT PROCESS

A Notice of Intent/Notice of Preparation to prepare the San Gabriel Canyon Sediment Management Plan SEIR was issued May 2, 2003 to the State Clearinghouse and over 50 agencies and interested organizations. The Notice of Availability of the Draft SEIR was printed in the San Gabriel Valley Tribune on July 10, 2003. A second notice was printed in the San Gabriel Valley Tribune on July 30, 2003. Comments received on the Draft SEIR are found in Section 2 of the Final SEIR. Responses to the comments received are found in Section 3 of the Final SEIR.

SECTION 2

COMMENTS RECEIVED ON DRAFT SEIR

2.1 Introduction

Comments on the Draft SEIR were received in written form.

2.2 Written Comments

In the attached comment letters, each comment is numbered separately. Responses to each comment are provided in Section 3.2. Written comments were received from the following individuals and organizations.

1. California Department of Transportation

2. United States Department of Agriculture – Forest Service – San Gabriel River Ranger District.

3. San Gabriel River Water Committee

4. Main San Gabriel Basin Watermaster

5. Los Angeles Regional Water Quality Control Board

NRD

DEPARTMENT OF TRANSPORTATION
DISTRICT 7, REGIONAL PLANNING
IGR/CEQA BRANCH
120 SO. SPRING ST.
LOS ANGELES, CA 90012
PHONE (213) 897-4429
FAX (213) 897-1337

Flex your power!
Be energy efficient!

August 8, 2003

Michele Chimienti
County of Los Angeles Department
of Public Works
900 South Fremont Avenue
Alhambra, CA 91803

Re: San Gabriel Canyon Sediment
Management Plan
Draft Supplemental E.I.R.
SCH number 1992061009
IGR/CEQA Number 030766/EK

Dear Michele Chimienti:

We received the EIR noted above right. We have the following comment regarding it.

We have no further comments beyond our letter of June 3 dealing with the NOP. Should conditions change, to affect any State highway, we ask to be notified. 1-1

If you have any questions regarding this comment, please refer to IGR/CEQA Number 030766/EK and contact me at (213) 897 – 4429 .

Sincerely,

STEPHEN J. BUSWELL
IGR/CEQA Program Manager, Regional Transportation Planning Office
California State Department of Transportation, District 7

cc: Mr. Scott Morgan, State Clearinghouse

DEPARTMENT OF TRANSPORTATION
DISTRICT 7, REGIONAL PLANNING
IGR/CEQA BRANCH
120 SO. SPRING ST.
LOS ANGELES, CA 90012
PHONE (213) 897-4429
FAX (213) 897-1337

Flex your power!
Be energy efficient!

June 3, 2003

Michele Chimienti
County of Los Angeles Department
of Public Works
900 South Fremont Avenue
Alhambra, CA 91803

Re: San Gabriel Canyon Sediment Management Plan
Notice of Preparation of E.I.R.
SCH number 1992061009
IGR/CEQA No. 030514/EK

Dear Michele Chimienti:

We have received materials including the Notice referenced above. We have the following comments regarding it.

Very extensive earth-moving operations are proposed. Special equipment deemed necessary might be transported by road to and from sites. Therefore we state a reminder, that any transportation of heavy construction equipment and/or materials which requires the use of oversized-transport vehicles on State highways will require a transportation permit from the State Department of Transportation. I-2

If removal of large amounts of sediments or other materials into or out of the immediate area is required, we request that the applicant address possible need for a truck-management plan. In that case, we ask that the applicant agree to avoid truck platooning (caravans of trucks) even on days when many truck trips per day might be desirable. I-3

In any case, we ask for planning to avoid disruption of traffic due to large size truck trips especially during peak-use periods on significant-use highways. I-4

If you have any questions regarding this comment, please refer to IGR/CEQA Number 030514/EK and contact me at (213) 897 – 4429 .

Sincerely,

STEPHEN J. BUSWELL
IGR/CEQA Program Manager, Regional Transportation Planning Office
California State Department of Transportation, District 7

cc: Mr. Scott Morgan, State Clearinghouse

United States Department of Agriculture | Forest Service | San Gabriel River Ranger District | 110 N. Wabash Ave. Glendora, CA 91741 626-335-1251 Voice 626-447-8992 TTY

File Code: 1950-1/2720-2
Date: August 23, 2003

Mr. Reza Izadi
LA Department of Public Works
Water Resources Division
Attention: Ms. Michele Chimienti
P.O. Box 1460
Alhambra, CA 91802-1460

Dear Mr. Izadi:

I have reviewed the Draft SEIR for the San Gabriel Canyon Sediment Management Plan and have the following comments:

1. Page 10 states "The CEIR assumed an 8.4 MCY sediment removal volume over a two-year period. The Curve and Williams fires have resulted in sediment potential that ranges from 5 MCY to 12 MCY." Page 74, subsection 5.5.6 states, "The duration of the emergency major cleanout would likely be three years to remove 5MCY, longer if more than 5 MCY has to be removed." The application that was submitted only asked for 4.3 MCY to be deposited. I would recommend amending the application for up to 12 MCY so that no additional applications need to be submitted at a later date. The permit may be issued for up to a twenty-year period if that is what the County requests. 2-1

2. Page 14, last paragraph states, "The truck-crossing impacts on the East Fork Road are of a permanent nature and would not be acceptable for routine cleanouts. As a result, trucking for routine cleanouts is not being considered under this SEIR." I would recommend that you include it in this analysis because there may be a need to do routine-cleanout during the life of the sediment placement site permit. The paragraph above the one I cited explains very well the need for the ramp and road crossing. I see no difference between the impacts associated with emergency or routine cleanout if the ramp has already been constructed. I would recommend keeping various options available as they pertain to the use of Burro Canyon as a sediment placement site. 2-2

3. Pages 83 and 84, subsection 5.10.5 discusses the effects to the shooting range and apiary and states that they must be relocated when those areas are needed for sediment placement. That statement is not entirely accurate. The existing shooting range is located in the west canyon and would not be affected by sediment placement because that area has not been identified for use in the latest studies nor was it included in the permit application submitted in January, 2003. The area used by the apiary is located in the area labeled stage 2, as submitted in your application. The apiary can be moved with sufficient notice or not even set up if it appears that the area will need to be used for sediment placement. A portion of the area labeled as stage 2 has been proposed for use 2-3

by the shooting range permittee for an expansion of his present facilities. The effects of this shooting range proposal on the use of the area as a sediment placement site will be evaluated prior to any decision being made. Based upon both applications, it appears that the sediment placement site and the shooting range can co-exist.

2-3

On another note, I would also like to minimize the amount of small sediment placement sites along Highway 39 and East Fork Road by utilizing Burro Canyon whenever feasible. I plan to issue the permit so that it allows for sediment placement at Burro Canyon to include sediment from locations other than San Gabriel Reservoir. There may be instances when storms or other events cause sediment or rock to cover roads as happened this past winter on the West Fork road. This would eliminate the need to apply for a new sediment placement permit as a result of these occasional events. If this will involve any other agencies, I will do the necessary coordination.

2-4

If you have any questions, please contact me.

Sincerely,

Marty Dumpis

MARTY DUMPIS
District Ranger

WRD 07

SAN GABRIEL RIVER WATER COMMITTEE
729 N. Azusa Ave. #5
Azusa, CA 91702-2528
(COMMITTEE OF NINE) *FOUNDED 1889*

August 27, 2003

Mr. Reza Izadi
LA County Dept. of Public Works
Water Resources Division
900 S. Fremont Ave.
Alhambra, CA 91803

Subject: Draft Supplemental EIR for San Gabriel Canyon Sediment Management Plan

Dear Mr. Izadi:

San Gabriel River Water Committee has been agreeable in the past to experience a "one-time, one year, trial run" utilizing LA County DPW's mitigation measures when San Gabriel Dam is sluiced into Morris Dam. When we had agreed to this there was also planned to have "in reservoir" treatment just below San Gabriel Dam. This treatment would aid the extremely turbid water to settle out considerably. These mitigation measures, including filling Morris Dam to an elevation to supply the Azusa Conduit, monitoring turbidities, and blending well water if needed, have not previously been attempted and therefore are not proven to be effective. As long as turbidity levels and water quality issues are manageable, we are in full support of the County plans with the following concerns. 3-1

The Azusa Conduit is currently inoperable between San Gabriel Dam and Morris Dam. Damage was sustained following the Curve Fire & Williams Fire in 2002 and the subsequent winter rains. We have been informed that repairs could possibly require one year to complete. The section of Azusa Conduit from Morris Dam to Azusa has a layer of mud deposition, but it has been reported that the mud should wash through with flushing, but since last year has not been tested. If there is an unseen problem with this lower section of conduit, our water would have to be released from a Morris Dam valve into the river. During sluicing valve releases would very likely be extremely turbid which would render this water unusable leaving us with no local water supply.

On page 99 it is stated that turbidity levels in San Gabriel Dam already exceed the RWQCB's objectives and our treatment plant limitations. Nature (the fires and the subsequent winter rains) has made water quality challenging this year and has also burdened us with financial constraints. However, we do not expect (from past experience) to have to be faced with these burdens every year. The import water that we have relied on last year and this year is subject to availability and is expensive. The wells have been available in large part because the Upper Canyon Basin has stayed relatively full from continuous deliveries of imported water during the summer months.

OFFICE (626) 815-0018 PAGER (626) 835-0474 FAX (626) 815-8659

On page 117 monitoring of turbidity and notification to the City of Azusa filtration plant does not include what plan of action you intend to initiate should the levels exceed the 10 NTU. We must be assured that high turbidity levels will result in a plan of action to immediately begin lowering the turbidity levels. 3-2

We are very concerned that there is no plan for sediment removal from Morris Dam. If San Gabriel Dam is "sluiced" into Morris Dam, this will more quickly fill Morris Dam possibly creating a very real emergency at Morris Dam and have a detrimental effect on flood control for the valley residents and businesses. Not only would water conservation for ground water recharge be impacted as stated on page 131, but also this would greatly impact our ability to receive river water releases from Morris Dam. With additional sediment deposition from sluicing San Gabriel Dam into Morris Dam, turbidity levels would likely exceed our ability to use this supply. This loss of supply would be catastrophic for us and to our large customer base that could result in water rationing or water outages in large portions of the San Gabriel Valley. Until there is a workable plan for sediment removal at Morris Dam, it is strongly recommended that sluicing San Gabriel Dam into Morris Dam only be used in an emergency. 3-3

We invite you to attend our regular monthly meeting or we will attend a meeting of your choice to discuss our concerns. Please contact Mr. Don Berry at (626) 815-0018.

Sincerely,

Mr. David DeJesus, Chairman

cc: Mr. Gary Hildebrand
Ms. Michele Chimienti

NRO

Main San Gabriel Basin
WATERMASTER

September 4, 2003

Mr. Reza Izadi, Water Resources Division
ATTN: Ms. Michele Chimienti
900 South Fremont Avenue
Alhambra, CA 91803-1331

RE: Comments on SEIR for San Gabriel Canyon Sediment Management Plan

Dear Mr. Izadi:

Thank you for the opportunity to provide comments on the Supplemental Environmental Impact Report (SEIR) for the San Gabriel Canyon Sediment Management Plan. The SEIR addresses methods and potential impacts of sediment removal from San Gabriel Reservoir as a result of major or emergency cleanouts. We understand that these efforts have been prompted in response to the Curve and Williams fires that devastated San Gabriel Canyon in 2002 and dramatically increased sediment in canyon reservoirs.

Watermaster recognizes the need for the County to undertake emergency cleanouts of San Gabriel Reservoir in order maintain flood control protection and water conservation capabilities, and we support the use of Burro Canyon as a sediment placement site. However, we are concerned about the loss of storage capacity in Morris Reservoir that will result from the use of sluicing to remove sediment from San Gabriel Reservoir. The SEIR cites the loss of Morris storage capacity as a significant impact of sluicing (Page 131, Section 9.1.2, Water Quality, Sluicing). Moreover, the SEIR indicates that sluicing of Morris Reservoir, the proposed method of sediment removal for that site based on the CEIR, is not expected to occur anytime in the near future due to objections from regulators and stakeholders (Page 120, Section 8.10.13.2, Cumulative Impacts). If the County opts to sluice materials from San Gabriel to Morris reservoirs, and there is no plan in place to remove the additional materials from Morris, the resulting loss of Morris storage capacity is a significant impact with no proposed mitigation. 4-1

Watermaster encourages County representatives to continue efforts through our Sediment Management Workgroup to meet with stakeholders and regulators to investigate additional ways to mitigate impacts of sluicing as well as alternative methods of sediment removal, particularly from Morris Reservoir. We remain committed to working with the County on solutions that will preserve flood control and water conservation capabilities without compromising local water management needs. 4-2

If you have any questions or would like additional information, please don't hesitate to contact me or Mark Velazquez of my staff at (626) 815-1300.

Sincerely,

Carol Williams
Executive Officer

CW/s

725 North Azusa Avenue • Azusa, California 91702 • Telephone (626) 815-1300 • Fax (626) 815-1303
http://www.watermaster.org

California Regional Water Quality Control Board
Los Angeles Region
Over 50 Years Serving Coastal Los Angeles and Ventura Counties
Recipient of the 2001 *Environmental Leadership Award* from Keep California Beautiful

Winston H. Hickox
Secretary for Environmental Protection

Gray Davis
Governor

320 W. 4th Street, Suite 200, Los Angeles, California 90013
Phone (213) 576-6600 FAX (213) 576-6640 - Internet Address: http://www.swrcb.ca.gov/rwqcb4

September 12, 2003

Reza Izadi
Los Angeles County Department of Public Works
900 South Fremont Avenue, 2nd Floor
Alhambra, CA 91803

SAN GABRIEL CANYON SEDIMENT MANAGEMENT PLAN, COMMENTS ON DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT (SEIR), SCH. # 1992061009 (FILE NO. 02-197)

Dear Mr. Izadi:

We appreciate the opportunity to review the Draft Supplemental Environmental Impact Report (SEIR) for the San Gabriel Canyon Sediment Management Plan. We have reviewed the Draft SEIR and have the following comments:

Section 1.4

The SEIR has not identified a preferred major clean out alternative. It appears that emergency cleanouts of the reservoir are what have occurred in the past. Please clarify how and when a long-term sediment removal plan will be implemented. 5-1

Section 2.3.5

Page 10 – The SEIR states that a range of 5 to 12 MCY may be deposited within the reservoir and will need to be removed. Please provide an actual estimate of what could feasibly be removed in a two-year time frame. 5-2

Page 11 – Please provide further detail on how the combinations for an emergency clean out will be implemented. 5-3

Page 11 – The SEIR indicates that a mitigation bank will be utilized for impacts associated with the project. Why was on-site mitigation in the form of restoration or enhancement not considered? 5-4

Section 2.5.5

Page 13 – Why would reseeding or replanting in Burro Canyon not be effective? The SEIR does not provide a very detailed explanation. 5-5

Section 2.6.2

Page 14 – Permit process time should not be a consideration when reviewing alternatives. 5-6

Section 3.3.1

Page 36 – The sentence from the FEIR states, ".. no comprehensive sediment sampling program has been performed at the San Gabriel Reservoir." The Regional Board recommends that a sediment sampling program be instituted for the San Gabriel Reservoir; before, during and after any sediment removal activities take place. Also, the development of TMDLs may necessitate providing further documentation on loading estimates with regard to pollutants this project may produce. 5-7

Section 3.10

Page 56 – How will Public Works address the Off Highway Vehicle (OHV) recreation impacts during clean out operations? 5-8

Section 5.4.2

Page 68 – The section regarding impacts to aquatic biota states, "Impacts could potentially occur from discharge of sediments or toxic materials into the reservoir or river (such as fuels, lubricants, construction wastes, etc.). This statement appears in several sections throughout the document. These types of impacts could be prevented with the utilization of Best Management Practices (BMPs). The implementation of BMPs will need to be addressed. 5-9

The Regional Board acknowledges Public Work's ongoing efforts to reduce the impacts from sediment management activities and recognizes the importance of maintaining the operational and storage capacities of the reservoirs in the San Gabriel Canyon. The Regional Board also recognizes that comments provided are for the Draft SEIR. We will continue to evaluate the potential impacts of the project, as new information becomes available. Furthermore, the Regional Board requests that we be consulted during the development of the San Gabriel Canyon Sediment Management Plan. We reserve the right to provide future comments throughout the CEQA review process; as comments will be taken into consideration during issuance of the Final 401 Water Quality Certification for this project.

Again, Regional Board staff appreciates the opportunity to comment on the Draft SEIR and related documents. Should you have any questions regarding this response, please contact Valerie Carrillo at (213) 576-6759.

Sincerely,

Raymond Jay
Chief, Nonpoint Source Unit

SECTION 3

RESPONSE TO COMMENTS ON DRAFT SEIR

3.1 INTRODUCTION

Responses to substantive comments received on the Draft SEIR are provided below.

3.2 RESPONSE TO WRITTEN COMMENTS – Notice of Preparation

Below, responses to written comments are numbered in the order in which the comments are marked on the comment letters provided in the previous section.

California Department of Transportation

1-1 The comments from your Notice of Preparation letter are addressed below.

1-2 The contractor will be required to obtain all transportation permits from the State Department of Transportation prior to transporting heavy construction equipment and/or oversized-transport vehicles to the site using State highways.

1-3 The use of a proposed ramp into Burro Canyon SPS site and/or conveyor belts to transport the large amount of sediment removed from the reservoir will address the Department of Transportation's concerns on truck platooning. In addition, Public Works will require the contractor to ensure no truck platooning on State highways.

1-4 The proposed ramp into Burro Canyon SPS from the reservoir basin or the use of a conveyor belt will minimize/avoid impacts during peak-use periods on significant-use highways. In addition, the sediment removal project will be conducted during the weekdays and avoid weekend excavations to minimize impacts during recreational uses of the Angeles National Forest and the shooting range located at Burro Canyon SPS.

United States Department of Agriculture-U.S. Forest Service
San Gabriel Ranger District

2-1 Public Works concurs with the recommendation to increase the amount of sediment to be deposited with the Special Use Permit application from 4.3 MCY to 12 MCY. The application was submitted early in the project process, prior to the completion of the Draft SEIR, and new information gained after the storm season indicates that the 4.3 MCY is too conservative. Amending the application will reduce the potential that additional applications will need to be submitted.

2-2 In an effort to expedite the cleanout during the current conditions at San Gabriel Reservoir, the SEIR addresses only major (emergency) cleanouts. The CEIR addresses routine sediment removal projects.

2-3 The SEIR will be corrected to reflect that the apiary is the only area that will need to be relocated when the apiary area is needed for sediment placement. The shooting area will only be impacted with traffic congestion during the weekdays (their facility's slowest time).

2-4 Public Works proposes to remove 5 to 12 MCY from San Gabriel Reservoir and place this sediment in Burro Canyon SPS. The project requires use of Burro Canyon for placement of up to 12 MCY.

San Gabriel River Water Committee

3-1 The Regional Water Quality Control Board has not approved the use of chemical treatment to reduce turbidity impacts from sluice flows into Morris Reservoir. The Board has expressed concerns with using Morris Reservoir as a settling basin for such activities and this alternative is not available at this time.

3-2 The impacts of the Williams and Curve Fires on San Gabriel Reservoir are expected to be seen for the next five years as the watershed recovers from the fires. During this time, the turbidity levels are expected to exceed the RWQCB's objectives and the treatment plant limitations. Standards were exceeded this year, even without implementation of the sediment removal project. As a result, the Committee of Nine states that it has already been purchasing replacement water. The mitigation measures outlined in the original CEIR recommend employing turbidity monitoring during sluicing of San Gabriel Reservoir. Sluicing will not be employed as a sediment removal method from San Gabriel Reservoir. Sluicing will not be employed as a post-fire sediment removal method from San Gabriel Reservoir. However, during the course of the post-fire sediment removal project the sluice gate of San Gabriel Dam will have to be opened to access the sediment in the lower areas of San Gabriel Reservoir, and turbidity levels may increase in Morris Reservoir. Barring excess sediment accumulation at San Gabriel Dam's outlet tower, the opening of the sluice gate will be postponed to the later phase (Phase 2) of the project.

In 2001 Public Works entered into a cost-sharing agreement with the City of Azusa, which owns some Committee of Nine water rights, to provide funding for the City to construct two new wells and two new pipelines, which would enable the Committee of Nine to obtain well water during routine sluicings. To date, the two wells and one pipeline are completed. With completion of the remaining pipeline and the permitting of the two wells by the Main San Gabriel Basin Watermaster, which is an obligation of the City under the cost-sharing agreement, the Committee of Nine would be able to utilize the well and pipelines to obtain an alternate source of water. The Committee of Nine could then use this well water to blend with the Azusa Conduit water during high turbidity

episodes to achieve lower turbidity levels in its distribution system. During the project the Committee of Nine will be alerted of increased turbidity so it can take measures to respond to the condition.

Turbidity levels will be monitored in the Azusa conduit during drawdown for Phase 2 cleanout. The Department will notify the Committee of Nine if turbidity levels in the conduit or intake exceed 10 NTU. Keeping Morris Reservoir full during drawdown, which will be done to enable deliveries to the Committee of Nine's Azusa Conduit intake at Morris Dam, will minimize drawdown impacts. The Committee of Nine may have to supply well water to users during the drawdown period if turbidity levels do not allow operation of the water treatment plant. In the Memorandum of Understanding signed January 30, 2001, the Committee of Nine acknowledged that the Department of Public Works is not required to assure water quality under emergency conditions (p. 7).

Temperature impact is most likely to occur during Phase 2 of the project, when San Gabriel Reservoir is completely drained. During Phase 2, the alternative intake for the Azusa Conduit is at Morris Dam (Morris Intake). The Morris Intake is located at the highest levels of the dam, necessitating the almost complete filling of Morris Reservoir with water and keeping the reservoir at that high level as long as possible. Normally, the Reservoir would be drawn down over the course of the summer to reach its debris pool by October 15 to ready the facility for the storm season. The increased water level in Morris Reservoir during Phase 2 of the project is anticipated to offset increases in temperature from the San Gabriel Dam outflow.

3-3 Morris Reservoir is used primarily as a water conservation reservoir and does not provide effective flood control and protection. San Gabriel Reservoir is the major flood protection facility in the San Gabriel Canyon. If Morris Reservoir is filled with sediment, there will be water conservation impacts. However, the San Gabriel Spreading Grounds located downstream of Morris Reservoir are the most productive spreading grounds that the County operates. Recharge at this facility would still be available even if Morris Reservoir was filled with sediment.

The SEIR document is limited to major (emergency) cleanout alternatives specifically to address the current post-fire watershed condition. This document proposes sluicing as an alternative for a major (emergency) cleanout. However, on the basis of comments to the SEIR and other factors including secondary impacts from sluicing, Public Works staff recommends that the County eliminate that part of the project that called for sluicing to Morris Reservoir.

Main San Gabriel Basin Watermaster

4-1 The SEIR indicates that sluicing from Morris Reservoir for routine cleanouts is not expected to occur in the near future due to objections from regulators and stakeholders. The SEIR specifically addresses major (emergency) cleanouts in which sluicing to Morris Reservoir may be an option. Public Works understands that sluicing sediment to Morris Reservoir is discouraged by other agencies. (See response 3-3.)

4-2 Public Works will continue to work with the Sediment Management Workgroup, comprised of stakeholders and regulators, to investigate additional ways to mitigate impacts of sluicing and alternative methods of sediment removal from Morris Reservoir. (See also response 3-3.)

Los Angeles Regional Water Quality Control Board

5-1 In an effort to expedite the cleanout during the current emergency conditions at San Gabriel Reservoir, the SEIR addresses only major (emergency) cleanouts. The Final SEIR proposes a modified Alternative 5 as the emergency sediment removal project that does not include sluicing to Morris Reservoir. The methods of sediment removal for this alternative include dry excavation and trucking or conveying sediment to Burro Canyon SPS. The CEIR addresses long term routine sediment cleanouts. The preferred alternative for routine cleanouts of San Gabriel Reservoir is specified in the CEIR as sluicing.

5-2 In the past, Public Works has removed 1 to 3 MCY from the reservoir within a year. Based on Public Works' past history, it is feasible to estimate that for a 2-year period, 2 to 6 MCY of sediment may be removed from the reservoir. The large range in volume is related to many variables, which include weather, length of storm season, and sediment transport methods (conveyor or trucking). Public Works intends to remove a minimum of 1 MCY per year for the next 5 years, and up to a total of 12 MCY over the next five years.

5-3 The project description will be clarified as described in Section 4.2 of this document pursuant to your request.

5-4 The 86-acre Invasive Species Removal Program that commenced in 1998 will be used to mitigate project impacts to habitat. This project removed, and continues to remove, invasive species from the San Gabriel River watershed. This watershed includes the project site.

5-5 The fill slopes will be terraced to ensure the stability of the Burro Canyon SPS. The surrounding hillsides were completely burned by the Williams Fire. The U.S. Forest Service's Burned Area Emergency Recovery (BAER) measures do not include planting vegetation on these hillsides, in accordance with the findings of the California Native Plant Society. The Society found that re-seeding burned

slopes does not provide effective erosion protection, since the hillsides usually already contain enough of a seed bank for recovery to occur on its own.

The sediment being placed in the fill areas, however, may not contain an adequate seed bank, so re-seeding is a reasonable mitigation measure for aesthetics and slope stability. The seeds will consist of species native to the San Gabriel Canyon area to blend with the surrounding recovering hillsides.

5-6 Due to the nature of emergency conditions, Public Works' experience in the past with permit process time, and obligation to other reservoirs, is a valid consideration when reviewing alternatives. The fact of the matter is that if the permits necessary to cleanout the reservoir are not obtained within the timeframe necessary to initiate a cleanout to prevent flooding and protect the public, certain alternatives may need to be chosen. The timeliness of permits has a direct impact on the feasibility of a project alternative.

5-7 A comprehensive sediment sampling program has not been performed at San Gabriel Reservoir in the past. Sediment testing at Morris Reservoir was required for the CEIR due to U.S. Navy ordinance testing at the reservoir. The sediment sampling did not reveal any contaminants in the sediment samples. (See CEIR, Appendix H.) The sediment in San Gabriel Reservoir is from the same source as the sediment in Morris Reservoir. No known causes of sediment contamination exist upstream of Morris Reservoir. The results from the Morris Reservoir sediment sampling are the baseline conditions.

5-8 The Off-Road Recreational Vehicle (ORV) use in the northerly section of the reservoir bed is determined by water elevation of the reservoir. To ensure the safety of construction workers as well as the ORV users the reservoir construction area will be flagged and blocked to prevent ORV intrusion. The ORV users will be able to continue their use of the West Fork area as permitted for recreation.

5-9 The discharge of toxic materials into the reservoir or river (such as fuels, lubricants, construction wastes, etc.) was mentioned in several places throughout the CEIR and SEIR. The CEIR required that a spill prevention plan will be developed and implemented during the cleanout operations to mitigate and minimize impacts from accidental spills. Best Management Practices (BMPs) are discussed on pages 116 and 122 of the SEIR and include performing equipment fueling, maintenance, and repairs in a designated area with adequate spill containment and properly scheduling maintenance of equipment. In the event of a spill, the following measures would be taken: notify parties listed in the spill prevention and control plan, immediately clean up all spills or leaks, and dispose spilled material in accordance with regulations established by the State Water Resources Control Board and the Los Angeles Regional Water Quality Control Board.

Section 4.0 – CHANGES AND CORRECTIONS TO THE DRAFT SEIR

4.1 INTRODUCTION

This section of the Final SEIR presents a summary of all the changes and modifications that have been made to the Draft SEIR. These changes have been made for the purpose of correcting and clarifying information contained within the Draft SEIR. Each of the changes made within the document have been noted below and marked according to page and line number. Inserts are shown below as underlined text. Deletions are shown by cross outs.

4.2 ADDITIONS AND CORRECTIONS

Page 1 Add the following paragraphs to Page 1 of the SEIR under the heading Executive Summary.

Project Objectives

The objectives of the emergency cleanout of sediment in San Gabriel Reservoir is to restore the flood control capacity requirements of the Los Angeles County Drainage Area (LACDA) system which was reduced after the Curve and Williams Fires.

Description

The SEIR provides information necessary to update the CEIR to cover an emergency major cleanout of San Gabriel Reservoir. The removal methods in the CEIR analyzed routine cleanouts. The alternatives included excavation and trucking or conveying the sediment to Burro Canyon SPS, or sluicing the sediment to Morris Dam. The CEIR proposed a maximum removal of 8.4 MCY over a 2 year-period for a major cleanout. (CEIR, Appendix G, p. 6-2.)

There is a significant possibility of increased sediment deposition as a result of the Williams and Curve Fires. To provide adequate flood protection, Public Works proposes to remove a total of 5 – 12 MCY of sediment from San Gabriel Reservoir within the next five years. The removed sediment will be placed at the Burro Canyon Sediment Placement Site. The volume of sediment removed from the reservoir is dependent on sediment deposition during the cleanout operation and the method of sediment removal.

The proposed project analyzed in the SEIR is Alternative 5 and as analyzed is a combination of sluicing/conveying/trucking for major cleanouts. Alternative 5 combines the impacts and mitigation measures for the three individual cleanout methods. The environmental impacts will be dependent upon the amount of sediment removed by each method.

However, on the basis of comments to the SEIR and other factors, the County has eliminated that part of the project that called for sluicing to Morris Reservoir.

NOTE: The SEIR includes information in italics from the CEIR to facilitate its review only. The information provided in italics is not to be reviewed as part of the SEIR, but only as background and reference information from the CEIR. The SEIR provides additional new information in plain text regarding the environmental impacts of trucking and conveying sediment to Burro Canyon SPS from San Gabriel Reservoir and discusses mitigation measures for the trucking and conveying alternatives.

The project will be completed in two phases.

Phase 1

Phase 1 of the sediment removal project requires drawing the reservoir down to minimum pool and removing all deposited sediment above the minimum pool level. Phase 1 is expected to be completed in one to three years.

Phase 2

Phase 2 of the sediment removal project requires draining the reservoir completely and removing sediment deposited in the portion of the reservoir normally covered by the minimum pool. The contractor will remove as much sediment from the reservoir as possible during the remaining contract period.

One of two events will trigger implementation of Phase 2 of the sediment removal project at San Gabriel Reservoir. These events are described below:

Event A - Successful completion of Phase 1

When the contractor finishes removing all sediment above the minimum pool footprint, the fish will be removed from the reservoir and the reservoir will be completely drawn down.

Event B – Sediment Build-up at Outlet Tower

Sediment build-up around the outlet tower jeopardizes flood control operations. Phase 2 will be implemented if the sediment build-up around the outlet tower reaches an elevation of 1300 feet above mean sea level. Sediment deposition to this level will require immediate sediment removal in order to protect the dam outlet structures. Sediment levels will be monitored at the outlet tower. If sediment reaches the 1300 foot level, the

reservoir will be drawn down and the sediment threatening the outlet tower will be removed.

Page 4 Add the following subsection under Section 5.10 in the Table of Contents: *5.10.2 Sluice to Morris (From CEIR, Information only)*.

Page 31 Change first paragraph beginning on line 8: ~~The Governing Board adopted the 1997 AQMP on November 15, 1996. The AQMD is in the process of preparing a comprehensive plan update – the Proposed 2003 Air Quality Management Plan for the South Coast Air Basin. Pending approval of the 2003 AQMP, the proposed actions are to be evaluated for conformity with the provisions of the 1997 AQMP.~~ During the preparation of the SEIR, as with the original Final EIS/EIR, Public Works used the Air Quality Handbook (1993), as instructed by Mr. Steve Smith of the South Coast Air Quality Management District (SCAQMD), to assist with air quality analyses. In addition, the 1997 Air Quality Management Plan objectives and the draft 2003 Air Quality Management Plan objectives available on the AQMD website, were reviewed to ensure compliance within the SEIR document.

Page 37 Change paragraph beginning on line 17: *Alteration of surface or groundwater quality which do not comply with standards recommended for the beneficial uses specified for water bodies in the project area in the* most current *Water Quality Control Plan~~, Los Angeles River Basin, State Water Resources Control Plan 1974 (RWQCB, 1975)~~.*.

Page 37 Change paragraph beginning on line 35: *A release of contaminants that impair the beneficial uses of surface and ground water beneath or adjacent to a landfill as set forth in California Code of Regulations~~, Title 23, Division 2, Chapter 15~~ concerning discharges of waste to land.*

Page 37 Change paragraph beginning on line 39: *Release of contaminants to the ground waters in such concentrations that they would result in exceedance of maximum contaminant levels specified in California Code of Regulations~~, Title 22, Division 14, Chapter 15~~ for drinking water.*

Page 50 Add the following paragraph at the end of the Noise section:
Potential noise impacts to construction workers on the project site will be mitigated to a level of less than significant by the implementation of hearing protection measures that are in compliance with Cal-OSHA regulations. Compliance with Cal-OSHA regulations, which are promulgated to protect worker safety, is required on all construction projects in California.

Page 51 Add the following information at line 31: The significance criteria used to determine impacts to transportation will be the Level of Service (LOS) method as specified in the CEIR Section 3.7.5, page 3-100.

Page 64 Delete beginning at line 26: ~~During summer months, longer days allow two shifts to be worked. Sediment removal for a major cleanout will implement one shift during spring and fall, and two shifts during the summer.~~

Page 84 Change sentence beginning on line 3: The ~~facilities~~ apiary must be relocated to an area already filled with sediment when the ~~space in the vicinity of the facilities~~ apiary area is needed for sediment placement.

Page 103 Add the following paragraph at line 6: All noise impacts are associated with impacts to the community. Possible noise impacts to employees on the sediment removal project site shall be mitigated through compliance to Cal-OSHA regulations and guidelines. The contractor will be responsible for compliance to Cal-OSHA.

Page 115 Delete item 1 in list and renumber beginning at line 27:

~~*1. Construction activities would commence no earlier than 7:00 a.m. to optmize local wind pattern dispersal of dust and equipment exhaust.*~~

Page 116 Add information to line 24: **Below Reservoir.** Turbidity measurements will be used to determine water quality during sluicing operations. Warning will be given to the San Gabriel River Water Committee (Committee of Nine) when turbidity reaches 10 NTU. Mitigation shall include reducing agitation rates during sluicing if the sediment removal rates from San Gabriel Reservoir are not significantly affected. However, water quality cannot be guaranteed during emergency conditions. The Committee of Nine must provide an alternative means of water supply during emergency conditions if turbidity values are too high. Water quality monitoring will be as follows:

Page 117 Add information at line 27: The six locations for fish relocations include Santa Fe Dam, Puddingstone Lake, Peck Road Lakes, Legg Lakes, Lake Evans and the East Fork (native fish only). ~~(See Appendix H.)~~

Page 117 Change description of baseline for riparian and aquatic habitat to read:

1. ~~Prior to sediment removal activities, by establishing a baseline description of the habitat.~~ The most current baseline habitat description of Brown Gulch has been provided to the agencies in the required Annual Reports in compliance with the Streambed Alteration and Water Discharge Requirement Permits for the Sediment Management Plan. The most recent Annual Report before cleanout activities will be used as the baseline habitat description. Mitigation measures will be based on this baseline description.

Page 121 Delete paragraph beginning at line 20:

~~The fill slopes will need to be terraced to ensure stability of the Burro Canyon SPS. Vegetation of the sediment fill will consist of re-seeding with native species to blend with the surrounding recovering hillsides. The surrounding hillsides were completely burned by the Williams Fire, but the U.S. Forest Service's Burned Area Emergency Recovery (BAER) measures do not include re-seeding or planting of these hillsides.~~

Replace paragraph with the following two paragraphs:

The fill slopes will be terraced to ensure the stability of the Burro Canyon SPS. The surrounding hillsides were completely burned by the Williams Fire. The U.S. Forest Service's Burned Area Emergency Recovery (BAER) measures do not include planting vegetation on these hillsides, in accordance with the findings of the California Native Plant Society. The Society found that re-seeding burned slopes does not provide effective erosion protection, since the hillsides usually already contain enough of a seed bank for recovery to occur on its own.

The sediment being placed in the fill areas, however, may not contain an adequate seed bank, so re-seeding is a reasonable mitigation measure for aesthetics and slope stability. The seeds will consist of species native to the San Gabriel Canyon area to blend with the surrounding recovering hillsides.

Page 122 Change line 5: One or more of ~~T~~the following mitigation measures ~~can~~ shall be implemented to reduce the vehicle emission impacts to the maximum extent feasible:

Page 122 Delete item 1 in list and renumber beginning at line 7:

~~*1. Construction activities would commence no earlier than 7:00 a.m. to optmize local wind pattern dispersal of dust and equipment exhaust.*~~

Page 122 Delete line 30: ~~2. Restrict equipment idling.~~

Change the line to read: 1. Equipment shall not be allowed to idle more than 15 minutes. Equipment shall be turned off if not in operation for 15 minutes.

Page 123 Delete line 21: ~~The following additional measures are proposed within the work area:~~

Replace with: The contractor shall implement one or more of the following additional measures within the work area:

Page 124 Replace the sentence on line 25 as follows: ~~This would not be necessary for 50 to 100 years according to the CEIR.~~ The water tank will be moved when the sediment fill is within 5 feet of the water tank. However, the sediment fill is not expected to reach this limit during the emergency sediment cleanout project described in this SEIR.

Page 125 Add the following sentence to line 11: Damage to the masonry tunnel will be restored to original condition by the contractor, as determined by photographic documentation of the tunnel.

Page 125 Change sentence starting on 36: Mitigation measures for Burro Canyon SPS are similar to those discussed in Subsections 8.5.13 and 8.6.13 of the CEIR. Refer to pages 120 and 121 of the SEIR.

Page 125 Delete sentence at line 42: ~~Standard county procedures will be used in compacting fill materials.~~

Replace with: The 2003 Edition of the Standard Specificatrions for Public Works Construction ("Greenbook") specifies procedures for compacting fill materials. These procedures shall be used during placement and compaction of fill materials.

Page 126 Change line 32: One or more of ~~T~~the following mitigation measures ~~can~~ shall be implemented to reduce the vehicle emission impacts to the maximum extent feasible:

Page 126 Delete line 37: ~~2. Restrict equipment idling.~~

Change the line to read: 1. Equipment shall not be allowed to idle more than 15 minutes. Equipment shall be turned off if not in operation for 15 minutes.

Page 127 Add the following sentence to line 14: These impacts will be mitigated using credits from the Invasive Species removal project which is described in Subsection 8.10.13.2 on Page 118.

Page 127 Under Public Services/Utilities section, delete the following:
Mitigation for the water tank located in Burro Canyon is discussed in Subsection 8.6.8 of the CEIR. ~~No other mitigation measures are necessary.~~

SECTION 5.0 – SUPPLEMENTAL EIR PREPARERS

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ENCLOSURE B

FINDINGS OF FACT AND STATEMENT OF OVERRIDING CONSIDERATIONS REGARDING THE SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT. SAN GABRIEL CANYON SEDIMENT MANAGEMENT PLAN (STATE CLEARING HOUSE NO. 1992061009)

The County of Los Angeles Board of Supervisors hereby certifies that the San Gabriel Canyon Sediment Management Plan Final Supplemental Environmental Impact Report dated September 2003 (SEIR), State Clearinghouse No. 1992061009 (which consists of a Draft SEIR dated July 2003, comments and recommendations received on the Draft SEIR, a list of public agencies and organizations commenting on the Draft SEIR, the responses to those comments, and other information added by the County as lead agency) has been completed in compliance with the California Environmental Quality Act (CEQA), the State CEQA Guidelines and the County's Environmental Guidelines; and that the Board has received, reviewed, and considered the information contained in the SEIR, and submission of comments from officials of the County of Los Angeles, County Departments, the public, and other municipalities and agencies.

Having received, reviewed, and considered the foregoing information, as well as any and all other information in the record, the Board hereby makes findings pursuant to and in accordance with Public Resources Code § 21081 and State CEQA Guidelines § 15091 as follows:

BACKGROUND

The Board certified the Environmental Impact Report (CEIR) for the San Gabriel Canyon Sediment Management Plan (SMP) in June of 1998. The CEIR consists of the draft EIR, the final EIR, and all appendices, including the SMP. The SMP provides details for routine sediment management regimes at the three dam and reservoir facilities in San Gabriel Canyon. These facilities include Cogswell Dam and Reservoir, San Gabriel Dam and Reservoir, and Morris Dam and Reservoir. The purpose of the routine sediment removal regimes is to provide flood protection for San Gabriel Valley residents and increase the volume of water conserved for groundwater recharge.

The CEIR outlined routine reservoir cleanout alternatives under normal conditions. The average annual sediment inflow into San Gabriel Reservoir under normal conditions is approximately 1.1 million cubic yards (MCY). Several alternatives were considered for routine cleanouts of San Gabriel Reservoir. The CEIR approved sluicing 2.2 MCY of sediment biennially from San Gabriel Reservoir into Morris Reservoir.

The CEIR discussed major cleanouts resulting from emergency events or conditions. The major sediment event for San Gabriel Reservoir is 3.2 MCY. The CEIR stated that San Gabriel Reservoir might require an emergency cleanout rate of 8.4 MCY over a two-year period.

Enclosure C. Mitigation Monitoring Program for San Gabriel Sediment Management Plan

Impact	Mitigation Measure	Monitoring Phase	Implementation Method	Monitoring Agency
Earth Resources				
Trucking to Burro Canyon requires widening the road to allow two-directional traffic of large trucks. Widening the road requires cutting the canyon wall or filling the adjacent streambed. Cutting the wall could lead to slope instability problems that could slow sediment removal and cause hazards. (SEIR, p. 95.)	**ER-1.1:** Standard County procedures will be used in compacting fill material. (SEIR, p. 125; The 2003 Edition of the Standard Specifications for Public Works Construction ("Greenbook").)	During construction of roadway; during sediment deposition in Burro Canyon SPS.	Site inspections shall verify implementation.	Department of Public Works; Construction Contractor.
	ER-1.2: Access road slope stability will be ensured using sound engineering principles based upon geotechnical recommendations. (SEIR, p. 125.)	During construction of roadway.	Site inspections shall verify implementation.	Department of Public Works; Construction Contractor.
Water Quality				
Impacts on water users due to increased turbidity in San Gabriel Reservoir could reduce water quality in Azusa Conduit and Duarte intake. The Committee of Nine will be adversely affected during the project.	**WQ-1.1** Develop and implement Best Management Practices within the San Gabriel Reservoir to lower turbidity values. Such practices may include: (1) When work in a flowing stream is unavoidable, divert the entire stream flow around the work area by barriers, temporary culverts, new channels, or other means. (2) Construct channel banks or barriers to prevent seepage into or from the work area. (3) Utilize materials that will not introduce pollutants into the water, such as onsite alluvium of low silt content, inflatable dams, sand bags, or other appropriate materials. (4) Enclose any earthen channel banks or barriers with protective materials such as sheet piling, rock rip-rap or other appropriate materials.	Prior to and during construction; during sediment deposition in Burro Canyon SPS.	Site inspections shall verify implementation.	Department of Public Works; Construction Contractor; Department of Fish and Game; Regional Water Quality Control Board
	WQ-1.2 Alert the Committee of Nine of increased turbidity so it can take measures to respond to the condition.	During construction activities; during sediment deposition in Burro Canyon SPS.	Written and oral notification within 24 hours of triggering event.	Department of Public Works.

Impact	Mitigation Measure	Monitoring Phase	Implementation Method	Monitoring Agency
Increased turbidity below the San Gabriel Reservoir will result from project activities and increase turbidity and temperature in Morris Reservoir beyond background levels. (SEIR, p. 67.)	**WQ-2.1:** Develop and implement a program to monitor turbidity in and below San Gabriel Reservoir. Every year of the project, prior to the start of sediment removal operations for the year, collect data upstream and downstream of San Gabriel Reservoir. This monitoring will determine the extent to which water quality, soil, and hydrological parameters vary during sediment removal operations, and to establish any correlation between those parameters and biological monitoring data that will be concurrently collected to offset impacts to biological resources. (SEIR, p. 116.) The water quality data will be submitted to the California Regional Water Quality Control Board, which will have established a performance standard commensurate with the beneficial uses that may be impacted by the increased turbidity.	Prior to and during construction; prior to sediment deposition in Burro Canyon SPS.	Monitoring program; site inspections shall verify implementation.	Department of Public Works; Biological Contractor; Regional Water Quality Control Board; Department of Fish and Game.
	WQ-2.2: Develop and implement a mixture of the following to reach the Regional Board's performance standard: (1) Use sandbags to build settling ponds. (2) Adjust release flow rate. (3) Isolating the work site and diverting water around the work area using barriers, temporary culverts, or new channels. (4) Prevent silt and other deleterious materials from migrating to downstream reaches through the placement of silt fencing, straw bales, sand bags, and/or construction of silt catchment basins.	Prior to and during construction; during sediment deposition in Burro Canyon SPS.	Site inspections shall verify implementation.	Department of Public Works; Construction Contractor; Regional Water Quality Control Board; Department of Fish and Game.
	WQ-2.3: Alert the Committee of Nine of increased turbidity so it can take measures to respond to the condition.	During construction activities; during sediment deposition in Burro Canyon SPS.	Written and oral notification within 24 hours of triggering event.	Department of Public Works.
Biology				
Dewatering of San Gabriel Reservoir during Phase 2 of the project may degrade 3.0 acres of riparian habitat in Browns Gulch that may be used by the Southwestern Pond Turtle and the Two-Striped Garter Snake.	**BIO-1.1:** Relocate the Southwestern Pond Turtle and Two-Striped Garter Snake during Phase 2 of the project to the West, North and East Forks of the San Gabriel River and/or to ponds below the San Gabriel Dam. Conduct population counts of both species at each relocation area annually for three years following relocation.	Prior to and during construction; during sediment deposition in Burro Canyon SPS.	Biological Contractor will implement approved monitor and relocation plan.	Department of Public Works; Biological Contractor; Department of Fish and Game.

Impact	Mitigation Measure	Monitoring Phase	Implementation Method	Monitoring Agency
Trucks crossing the East Fork of the San Gabriel River to access the constructed ramp and conveyor areas could impact the Santa Ana Sucker entering the project area and its habitat. (SEIR, p. 70.)	**BIO-2.1:** Place fish nets in the West and East Forks of the San Gabriel River to prevent the Santa Ana Sucker from entering the construction area.	Prior to and during construction; during sediment deposition in Burro Canyon SPS.	Biological Contractor will implement approved monitor and relocation plan.	Department of Public Works; Biological Contractor; United States Forest Service; United States Fish and Wildlife Services; Department of Fish and Game.
	BIO-2.2: Install a limited number of stream crossing ramps on the East Fork to access the constructed ramp and conveyor areas and avoid damage to the Santa Ana Sucker's habitat.	Prior to and during construction; during sediment deposition in Burro Canyon SPS.	Site inspections shall verify implementation.	Department of Public Works; Construction Contractor; United States Forest Service; United States Fish and Wildlife Services; Department of Fish and Game.
Impact to 3 acres of riparian habitat in Brown's Gulch could result during Phase 2 of the project. (SEIR, p. 101.) Earth ramp used by trucking could cover 7.14 acres of upland habitat and 1.5 acres of riparian habitat in Burro Canyon. (SEIR, p. 102.)	**BIO-3.1:** Use 11.64 acres of credits from Public Works' ongoing invasive species removal program to offset the acres of upland and riparian habitat impacted by the truck ramp, Burro Canyon access road widening, and Phase 2 of the project.	Biological Assessment – Prior to and after construction.	Biological Assessment surveys and reports.	Department of Public Works; Biological Contractor; United States Army Corp of Engineers; Department of Fish and Game; Regional Water Quality Control Board.
Noise				
There may be impacts to workers from machinery and truck operations during conveying or trucking. (FSEIR, p. 23.)	**NOI 1.1:** Cal-OSHA hearing protection measures shall be implemented.	During Construction.	Inspectors will ensure compliance.	Department of Public Works; Construction Contractor.

Impact	Mitigation Measure	Monitoring Phase	Implementation Method	Monitoring Agency
Transportation				
Heavy equipment use of East Canyon Road and trucking sediment from the reservoir to the SPS through the existing access road would increase traffic on Highway 39, East Fork Canyon Road, and Burro Canyon access road.	**TRA-1.1:** Construct an earthen ramp from the upper end of the reservoir to Burro Canyon SPS entrance.	Prior to construction.	Specify in bid requests, contractor plans and specifications; site inspections shall verify implementation.	Department of Public Works; Construction Contractor.
	TRA-1.2: Restrict work schedule to Monday through Friday.	During construction; during sediment deposition in Burro Canyon SPS.	Specify in bid requests, contractor plans and specifications; site inspections shall verify implementation.	Department of Public Works; Construction Contractor.
	TRA-1.3: Widen the access road to Burro Canyon to allow two-way traffic access to and from the canyon and sediment placement site.	Prior to construction.	Specify in bid requests, contractor plans and specifications; site inspections shall verify implementation.	Department of Public Works; Construction Contractor.
Recreational/Aesthetics/Socioeconomics				
Loss of aesthetic viewsheds at San Gabriel and Burro Canyon SPS during project will occur.	**RAS-1.1:** Revegetate Burro Canyon SPS after project completion will improve the viewsheds and mitigate view loss to insignificant level.	Post-Construction; post-sediment deposition in Burro Canyon SPS.	Site inspections and reports shall verify implementation.	Department of Public Works; Construction Contractor; United States Forest Service; Regional Water Quality Control Board; Department of Fish and Game.

Cultural Resources				
The masonry tunnel may be impacted when the Burro Canyon access road is widened to allow two-way trucking. (SEIR, p. 85.)	**CR-1.1:** The current conditions of the masonry tunnel will be documented and restored to pre-project conditions, if there is any damage to the tunnel, by the contractor.	Prior to construction of ramp and after construction completion.	Document tunnel via photos; require contractor to restore damage in plans and specifications.	Department of Public Works; Construction Contractor.
Public Services/Utilities				
A water tank used for storing water for fire fighting purposes is located in the middle of Burro Canyon. The tank will eventually be impacted by sediment deposition in Burro Canyon. (SEIR, p. 108.)	**PSU-1.1:** The water tank will be moved when the sediment fill is within 5 feet of the tank.	During Construction; during sediment deposition in Burro Canyon SPS.	Site inspections shall verify implementation.	Department of Public Works; United States Forest Service.
Air Quality				
Reactive organic gases, nitrogen oxide, and particulate emissions criteria, established by the South Coast Air Quality Management District at 75, 100, and 150 pounds per day, respectively, may be exceeded during the construction period.	**AQ-1.1:** Water-down earthwork areas and unpaved transport routes as needed. To minimize water consumption, chemical soil binders could also be used on the transport routes, as approved by applicable regulatory agencies.	During Construction; during sediment deposition in Burro Canyon SPS.	Site inspections shall verify implementation.	Department of Public Works; Construction Contractor; SCAQMD.
	AQ1.2: Suppress earthmoving activities involving non-enclosed methods of transport during periods of high wind (i.e., wind speeds of over 25 miles per hour).	During Construction; during sediment deposition in Burro Canyon SPS.	Site inspections shall verify implementation.	Department of Public Works; Construction Contractor; SCAQMD.

Impact	Mitigation Measure	Monitoring Phase	Implementation Method	Monitoring Agency
	AQ1.4: Cover or wet sediment loads being transported by scrapers or other equipment into the SPS, depending on the already-existing moisture content of the soil.	During Construction; during sediment deposition in Burro Canyon SPS.	Site inspections shall verify implementation.	Department of Public Works; Construction Contractor; SCAQMD.
	AQ-1.5: Cover disturbed areas subject to wind erosion with fine netting, tarp, or other material depending upon the soil moisture content of the soil.	During Construction; during sediment deposition in Burro Canyon SPS.	Site inspections shall verify implementation.	Department of Public Works; Construction Contractor; SCAQMD.
	AQ1.6: Erect a barrier along the downwind perimeter of the earthmoving areas to prevent dust particle transport into the wilderness area.	During Construction; during sediment deposition in Burro Canyon SPS.	Site inspections shall verify implementation.	Department of Public Works; Construction Contractor; SCAQMD.
	AQ 1.7: Limit on-site vehicle speed to 15 mph.	During Construction; during sediment deposition in Burro Canyon SPS.	Site inspections shall verify implementation.	Department of Public Works; Construction Contractor; SCAQMD.
	AQ1.8: Minimize the transport of sediment by equipment through the use of vehicles that carry larger loads in less trips and can be effectively covered.	During Construction; during sediment deposition in Burro Canyon SPS.	Site inspections shall verify implementation.	Department of Public Works; Construction Contractor; SCAQMD.

Impact	Mitigation Measure	Monitoring Phase	Implementation Method	Monitoring Agency
	AQ1.9: The following mitigation measures shall be implemented to reduce the vehicle emission impacts: 1. Utilize low sulfur content fuel in all equipment. 2. Equipment shall not be allowed to idle more than 15 minutes. Equipment shall be turned off if not in operation for 15 minutes. 3. Maintain equipment engines and generators in proper tune (including keeping a record of scheduled maintenance and repairs for verification purposes). 4. Retrofit all equipment as technically and economically feasible with a diesel emulsification/catalytic conversion system to reduce emissions.	During Construction; during sediment deposition in Burro Canyon SPS.	Site inspections shall verify implementation.	Department of Public Works; Construction Contractor; SCAQMD.

The CEIR did not identify a preferred major cleanout alternative because major sediment events are unpredictable. The CEIR determined that conveying sediment to the Burro Canyon Sediment Placement Site (SPS) was the most efficient sediment transport and disposal method for San Gabriel Reservoir.

The 2002 Curve and Williams Fires burned over 58,000 acres primarily in the Angeles National Forest. Thirty percent of the watershed tributary to San Gabriel Dam and Reservoir was burned, which dramatically increases the likelihood of winter storms depositing significant amounts of sediment in the reservoir.

Insufficient rainfall since 1999 has prevented routine sediment sluicing to remove sediment from San Gabriel Reservoir in accordance with the CEIR. Sediment deposition has exceeded the 3.2 MCY limit which triggers a major cleanout, and the burned watershed greatly increased the watershed potential to produce sediment. Therefore, an increased amount of sediment must be removed to meet flood control requirements determined by the U.S. Army Corps of Engineers Los Angeles Drainage Area Study.

The Supplemental Environmental Impact Report

Public Works has prepared this SEIR for the County of Los Angeles. The County of Los Angeles is the lead agency for the project.

The SEIR provides information necessary to update the San Gabriel Canyon SMP CEIR to cover an emergency major cleanout of San Gabriel Reservoir in the wake of the Curve and Williams Fires. The proposed project analyzed in the SEIR is Alternative 5 and is a combination of sluicing/conveying/trucking for major cleanouts. Alternative 5 combines the impacts and mitigation measures for the three individual cleanout methods. The environmental impacts will be dependent upon the amount of sediment removed by each method. However, on the basis of comments to the SEIR and other factors regarding the secondary impacts of sluicing, the County has eliminated that part of the project that called for sluicing to Morris Reservoir. Consequently, the project addressed by these findings includes only conveying and trucking for major cleanouts.

The CEIR includes environmental impact information associated with: sluicing sediment from San Gabriel Reservoir into Morris Reservoir; dry excavation in San Gabriel Reservoir; transport by conveyor belt to Burro Canyon SPS; and placement within Burro Canyon SPS. The SEIR includes this information in italics from the CEIR to facilitate its review. The information provided in italics is not to be reviewed as part of the SEIR, but only as background and reference information from the CEIR.

The SEIR provides additional new information in plain text regarding the environmental impacts of trucking sediment to Burro Canyon SPS from San Gabriel Reservoir and discusses mitigation measures for the trucking alternative.

On May 2, 2003, Public Works circulated a Notice of Preparation (NOP) for the draft SEIR to the State Clearinghouse; the County Clerk; appropriate Federal, State, regional, and local governmental agencies; and to various stakeholders and organizations. A Notice of Availability of the Draft SEIR was published pursuant to Section 21092 of the Public Resources Code in the San Gabriel Valley Tribune on July 10, 2003. A second notice was printed in the San Gabriel Tribune on July 30, 2003. In addition, Public Works provided copies of the Draft SEIR for public review at the Azusa City Library located at 729 North Dalton Avenue, Azusa, CA 91702, and at Public Works Library located at 900 South Fremont Avenue, Alhambra, CA 91803. The Draft SEIR was completed and forwarded to the State Office of Planning and Research on July 17, 2003. Copies of the Draft SEIR were provided directly to various Federal, State, and local government agencies, as well as interested organizations.

The public review and comment period commenced on July 17, 2003, and ended on September 5, 2003. Comments were received regarding the proposed project and the analysis of the draft SEIR. Detailed responses to those comments have been provided in the final SEIR and were considered in deciding to approve the proposed project. As required by Public Resources Code § 21092.5, a written response to any comments made by a public agency was provided to the commenting public agency on October 3, 2003, at least 10 days prior to certifying the final SEIR on October 14, 2003.

As required by State CEQA Guidelines § 15163(e), the Board has considered the CEIR as revised by the SEIR. The findings herein are made for each significant effect in the CEIR as revised by the SEIR. Sections 1 and 2 of these findings set forth potential environmental effects of the proposed project. Section 1 addresses those impacts that were found to be not significant and do not require mitigation, and those impacts which can be feasibly mitigated to a level of less than significant. Section 2 addresses those impacts that were found to be significant and which could not be mitigated to a level of less than significant.

SECTION 1

POTENTIAL ENVIRONMENTAL EFFECTS WHICH ARE NOT SIGNIFICANT OR WHICH CAN BE MITIGATED TO A LEVEL OF LESS THAN SIGNIFICANT

The project analyzed in the SEIR will not have significant adverse impacts requiring any mitigation relative to:

- Energy. Conveyor and sediment crushing operations would require an insignificant amount of electricity in relation to the demand in the County. (SEIR, pp. 108-109.)

- Natural Resources. Placement of sediment in Burro Canyon will not impact a source of aggregate mineral resource materials since Burro Canyon is not known to contain significant natural resources. (SEIR, p. 75.) Given the flood control system in the area, the aggregate materials that are sluiced out of San Gabriel Reservoir would not have traveled downstream for aggregate use, and thus the placement of the aggregate in Burro Canyon does not have any downstream natural resource impacts. (SEIR, pp. 104, 119, 124, 127.)

- Cumulative Impacts. There are no projects scheduled in the area surrounding San Gabriel Reservoir for the project period. Accordingly, pursuant to State CEQA Guidelines § 15130, there are no other project's impacts to which the project analyzed in the SEIR could incrementally add so that the project's impacts might be cumulatively considerable. In the event that another project is funded and scheduled to begin during the sediment removal project, the environmental impacts of that project will need to be addressed, including the cumulative impacts resulting from any implementation that occurs while the reservoir is being cleaned out, before that project is implemented.

The following environmental impacts can be feasibly mitigated to a level of less than significant:

Earth Resources

Potential Effect ER-1: Trucking to Burro Canyon requires widening the road to allow two-directional traffic of large trucks. Widening the road requires cutting the canyon wall or filling the adjacent streambed. Cutting the wall could lead to slope instability problems that could slow sediment removal and cause hazards. (SEIR, p. 95.)

> Findings Pursuant to State CEQA Guidelines § 15091 – Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the SEIR. The following mitigation measures and features incorporated into the project will reduce the impact identified in the SEIR to a level of less than significant.

Facts Supporting Finding – Fill slopes will be properly compacted. Standard County procedures are already in place to address fill compaction. To avoid slope instability from any cutting into the canyon wall, Public Works will study the geotechnical issues created by cutting, and properly engineer the roadway and slope cuts to stabilize the slope remaining after cutting of the canyon wall. To stabilize the canyon from any fill activities from the roadway, the fill will be properly compacted. The following measures will mitigate the identified impact to a level of less than significant.

ER-1.1: Standard County procedures will be used in compacting fill material. (SEIR, p. 125; The 2003 Edition of the Standard Specifications for Public Works Construction ("Greenbook").)

ER-1.2: Access road slope stability will be ensured using sound engineering principles based upon geotechnical recommendations. (SEIR, p. 125.)

Water Quality

Potential Effect WQ-1: Impacts on water users due to increased turbidity in San Gabriel Reservoir could reduce water quality in Azusa Conduit and Duarte intake. The Committee of Nine will be adversely affected during the project.

Findings Pursuant to State CEQA Guidelines § 15091 – Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the SEIR. The following mitigation measures and features incorporated into the project will reduce the impact identified in the SEIR to a level of less than significant.

Facts Supporting Finding – As a result of the Williams and Curve Fires, and before any project activities have been undertaken, turbidity levels of the flows in San Gabriel Canyon are regularly above the 10-NTU limitations placed on the intakes to the Committee of Nine's water treatment plants. (SEIR, pp. 67, 98.) These turbidity levels likely already exceed Regional Water Quality Control Board standards. (Ibid.) As a result, the Committee of Nine has already been purchasing replacement water. (SEIR, Committee of Nine comment letter.) A Memorandum of Understanding between the County and the Committee of Nine provides that the County is not required to provide the Committee with replacement water until turbidity levels exceed 10 NTU. However, the MOU is applicable to routine sluicing activities only. Emergency projects are excluded from the MOU requirements. Additionally, in 2001 Public Works entered into a cost-sharing agreement with the City of Azusa, which owns some Committee of Nine water rights, to have the City construct two new wells and two new pipelines to enable the Committee of Nine to obtain well water during

routine sluicings. To date, the two wells and one pipeline are completed. With the City's completion of the remaining pipeline and the permitting of the two wells by the Main San Gabriel Basin Watermaster, the Committee of Nine would be able to utilize the well and pipelines to obtain an alternate source of water. The Committee of Nine could then use this well water to blend with the Azusa Conduit water during high turbidity episodes to achieve lower turbidity levels in its distribution system. During the project the Committee of Nine will be alerted of increased turbidity so it can take measures to respond to the condition. The above finding is made in that the following measures will mitigate the identified impact to a level of less than significant. (SEIR, p. 123.)

WQ-1.1 Develop and implement Best Management Practices within the San Gabriel Reservoir to lower turbidity values. Such practices may include: (1) When work in a flowing stream is unavoidable, divert the entire stream flow around the work area by barriers, temporary culverts, new channels, or other means. (2) Construct channel banks or barriers to prevent seepage into or from the work area. (3) Utilize materials that will not introduce pollutants into the water, such as onsite alluvium of low silt content, inflatable dams, sand bags, or other appropriate materials. (4) Enclose any earthen channel banks or barriers with protective materials such as sheet piling, rock rip-rap or other appropriate materials.

WQ-1.2 Alert the Committee of Nine of increased turbidity so it can take measures to respond to the condition.

Potential Effect WQ-2: Increased turbidity below the San Gabriel Reservoir will result from project activities and increase turbidity and temperature in Morris Reservoir beyond background levels. (SEIR, p. 67.)

Findings Pursuant to State CEQA Guidelines § 15091 – Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the SEIR. The following mitigation measures and features incorporated into the project will reduce the impact identified in the SEIR to a level of less than significant.

Facts Supporting Finding – The mitigation measure listed below will reduce turbidity impacts to downstream waters. Settling ponds will slow down water flow and allow solids to settle out. Diverting water around work areas will prevent the water from picking up increased sediment loads in the first instance, as will placing barriers to increased sediment flow. (SEIR, p. 123.) The Committee of Nine has already been purchasing replacement water due to the current watershed conditions. Also, the Committee of Nine will be able to utilize well water for blending with high turbidity Azusa Conduit water when the City of Azusa completes construction of a local pipeline and the Main San Gabriel Basin Watermaster permits the two new

wells the City recently constructed. The temperature impact is most likely to occur during Phase 2 of the project, when San Gabriel Reservoir is completely drained. During Phase 2, the alternative intake for the Azusa Conduit is at Morris Dam (Morris Intake). The Morris Intake is located at the highest levels of the dam, necessitating the almost complete filling of Morris Reservoir with water and keeping the reservoir at that high level as long as possible. Normally, the reservoir would be drawn down over the course of the summer to reach its debris pool by October 15 to ready the facility for the storm season. The increased water level in Morris Reservoir during Phase 2 of the project is anticipated to offset increases in temperature from the San Gabriel Dam outflow. Additionally, unlike turbidity, the Committee of Nine has never indicated having problems with the temperature of the water delivered to the Azusa Conduit. The above finding is made in that the following measures will mitigate the identified impact to a level of less than significant.

WQ-2.1: Develop and implement a program to monitor turbidity in and below San Gabriel Reservoir. Every year of the project, prior to the start of sediment removal operations for the year, collect data upstream and downstream of San Gabriel Reservoir. This monitoring will determine the extent to which water quality, soil, and hydrological parameters vary during sediment removal operations, and to establish any correlation between those parameters and biological monitoring data that will be concurrently collected to offset impacts to biological resources. (SEIR, p. 116.) The water quality data will be submitted to the California Regional Water Quality Control Board, which will have established a performance standard commensurate with the beneficial uses that may be impacted by the increased turbidity.

WQ-2.2: Develop and implement a mixture of the following to reach the Regional Board's performance standard: (1) Use sandbags to build settling ponds. (2) Adjust release flow rate. (3) Isolating the work site and diverting water around the work area using barriers, temporary culverts, or new channels. (4) Prevent silt and other deleterious materials from migrating to downstream reaches through the placement of silt fencing, straw bales, sand bags, and/or construction of silt catchment basins.

WQ-2.3: Alert the Committee of Nine of increased turbidity so it can take measures to respond to the condition.

Biology

Potential Effect BIO-1: Dewatering of San Gabriel Reservoir during Phase 2 of the project may degrade 3.0 acres of riparian habitat in Browns Gulch that may be used by the Southwestern Pond Turtle and the Two-Striped Garter Snake.

Findings Pursuant to State CEQA Guidelines § 15091 – Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the SEIR. The following mitigation measures and features incorporated into the project will reduce the impact identified in the SEIR to a level of less than significant.

Facts Supporting Finding – Relocating the Southwestern Pond Turtle and Two-Striped Garter Snake will protect the survival of those species in the area and will protect against harm to the species from project activities. The above finding is made in that the following measures will mitigate the identified impact to a level of insignificance.

BIO-1.1: Relocate the Southwestern Pond Turtle and Two-Striped Garter Snake during Phase 2 of the project to the West, North, and East Forks of the San Gabriel River and/or to ponds below the San Gabriel Dam. Conduct population counts of both species at each relocation area annually for three years following relocation.

Potential Effect BIO-2: Trucks crossing the East Fork of the San Gabriel River to access the constructed ramp and conveyor areas could impact the Santa Ana Sucker entering the project area and its habitat. (SEIR, p. 70.)

Findings Pursuant to State CEQA Guidelines § 15091 – Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the SEIR. The following mitigation measures and features incorporated into the project will reduce the impact identified in the SEIR to a level of less than significant.

Facts Supporting Finding – Fish nets will prevent species from migrating into the Reservoir during project activities as the fish will not be able to cross the nets. (SEIR, p. 70.) Conveyor belt construction and use will require stream crossing at the East Fork, but limiting the number of crossings will minimize the impacts. (SEIR, p. 72.) The above finding is made in that the following measures will mitigate the identified impact to a level of less than significant.

BIO-2.1: Place fish nets in the West and East Forks of the San Gabriel River to prevent the Santa Ana Sucker from entering the construction area.

BIO-2.2: Install a limited number of stream crossing ramps on the East Fork to access the constructed ramp and conveyor areas and avoid damage to the Santa Ana Sucker's habitat.

Potential Effect BIO-3: Impact to 3 acres of riparian habitat in Brown's Gulch could result during Phase 2 of the project. (SEIR, p. 101.) Earth ramp used by trucking could

cover 7.14 acres of upland habitat and 1.5 acres of riparian habitat in Burro Canyon. (SEIR, p. 102.)

Findings Pursuant to State CEQA Guidelines § 15091 – Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the SEIR. The following mitigation measures and features incorporated into the project will reduce the impact identified in the SEIR to a level of less than significant.

Facts Supporting Finding – The use of credits from Public Works' ongoing 86-acre invasive species removal program is a viable measure to offset impacts or loss to terrestrial habitat. In 1998 Public Works initiated the invasive species removal program to mitigate for the permanent habitat degradation associated with routine, biennial sluicings of San Gabriel Reservoir (0.8 acres) and Morris Reservoir (62 acres) under the San Gabriel Canyon Sediment Management Plan. The CEIR described the details of the invasive species removal program. Public Works engaged the U.S. Forest Service to undertake the work. However, subsequent to the CEIR, biennial sluicings have been opposed by the regulatory agencies and other stakeholders due to their concerns about sluicing's secondary impacts, so Public Works was able to perform only one sluicing, that at Morris Reservoir in 1998. By 2001, the habitat below Morris Reservoir that was impacted by the 1998 sluicing recovered to and in fact exceeded its pre-sluice values. However, the invasive species removal program is ongoing. As a result, Public Works is currently mitigating for a permanent sluicing impact that did not occur. Given the opposition to any additional sluicings of Morris Reservoir, it is unlikely such impacts will occur downstream of Morris in the foreseeable future. Therefore, it is reasonable to apply the benefits of Public Works' ongoing invasive species removal program towards this post-fire emergency sediment removal project. (SEIR, p.118.) The above finding is made in that the following measures will mitigate the identified impact to a level of less than significant.

BIO-3.1: Use 11.64 acres of credits from Public Works' ongoing invasive species removal program to offset the acres of upland and riparian habitat impacted by the truck ramp, Burro Canyon access road widening, and Phase 2 of the project.

Noise

Potential Effect NOI-1, Impact on Construction Workers: There may be impacts to workers from machinery and truck operations during conveying or trucking. (SEIR, p. 23.)

Findings Pursuant to State CEQA Guidelines § 15091 – Changes or alterations have been required in, or incorporated into, the project that avoid or substantially

lessen the significant environmental effect as identified in the SEIR. The following mitigation measures and features incorporated into the project will reduce the impact identified in the SEIR to a level of less than significant.

Facts Supporting Finding – Cal-OSHA standards contain hearing protection measures, and were promulgated to protect worker safety. Compliance with these standards is required on all construction projects in California. (SEIR, p. 23.) The above finding is made in that the following measures will mitigate the identified impact to a level of less than significant.

NOI 1.1: Cal-OSHA hearing protection measures shall be implemented.

Transportation

Potential Effect TRA-1: Heavy equipment use of East Fork Road and trucking sediment from the reservoir to the SPS through the existing access road would increase traffic on Highway 39, East Fork Road, and Burro Canyon access road.

Findings Pursuant to State CEQA Guidelines § 15091 – Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the SEIR. The following mitigation measures and features incorporated into the project will reduce the impact identified in the SEIR to a level of less than significant.

Facts Supporting Finding – The construction of an earthen ramp from the upper end of the reservoir to Burro Canyon SPS entrance will minimize traffic impacts on Highway 39 and along East Fork Road. This will allow trucks to access Burro Canyon by crossing over East Fork Road directly into Burro Canyon, and thus the trucks will spend less time on East Fork Road. (SEIR, p. 127.) Restricting work schedule to Monday through Friday would reduce the impacts to the shooting range users since Burro Canyon and the shooting range are used mainly on the weekends. (SEIR, p. 127.) Widening the access road to Burro Canyon allows two-way traffic access to and from the canyon and sediment placement site. Allowing two-way traffic reduces the impacts to traffic within Burro Canyon and allows more sediment to be removed. (SEIR, p. 127.) The above finding is made in that the following measures will mitigate the identified impact to a level of less than significant.

TRA-1.1: Construct an earthen ramp from the upper end of the reservoir to Burro Canyon SPS entrance.

TRA-1.2: Restrict work schedule to Monday through Friday.

TRA-1.3: Widen the access road to Burro Canyon to allow two-way traffic access to and from the canyon and sediment placement site.

Recreation/Aesthetics/Socioeconomics

Potential Effect RAS-1: Loss of aesthetic viewsheds at San Gabriel and Burro Canyon SPS during project will occur.

Findings Pursuant to State CEQA Guidelines § 15091 – Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the SEIR. The following mitigation measures and features incorporated into the project will reduce the impact identified in the SEIR to a level of less than significant.

Facts Supporting Finding – The California Native Plant Society does not recommend revegetation of burned areas since even after a burn there are adequate seeds remaining in the soil to revegetate the area. However, the sediment from the reservoir that is being deposited into Burro Canyon likely does not have seeds and would take a very long time to grow vegetation in keeping with the surrounding area. Seeding the fill slopes with native species will supply the necessary seed and plant materials to blend the sediment placement area with adjacent, undisturbed areas. The above finding is made in that the following measures will mitigate the identified impact to a level of less than significant.

RAS-1.1: Revegetate Burro Canyon SPS after project completion will improve the viewsheds and mitigate view loss to insignificant level.

Cultural Resources

Potential Effect CR-1: The masonry tunnel may be impacted when the Burro Canyon access road is widened to allow two-way trucking. (SEIR, p. 85.)

Findings Pursuant to State CEQA Guidelines § 15091 – Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the SEIR. The following mitigation measures and features incorporated into the project will reduce the impact identified in the SEIR to a level of less than significant.

Facts Supporting Finding – The masonry tunnel conditions prior to disturbance are capable of being completely restored. (SEIR, p. 125.) The above finding is made in that the following measures will mitigate the identified impact to a level of less than significant.

CR-1.1: The current conditions of the masonry tunnel will be documented and restored to pre-project conditions, if there is any damage to the tunnel, by the contractor.

Public Services/Utilities

Potential Effect PSU-1, Relocation of Water Tank: A water tank used for storing water for fire fighting purposes is located in the middle of Burro Canyon. The tank will eventually be impacted by sediment deposition in Burro Canyon. (SEIR, p. 108.)

Findings Pursuant to State CEQA Guidelines § 15091 – Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the SEIR. The following mitigation measures and features incorporated into the project will reduce the impact identified in the SEIR to a level of less than significant.

Facts Supporting Finding – The water tank can easily be moved when necessary. (SEIR, p. 108.) It is not anticipated that sediment deposition will come within 5 feet of the tank during the emergency cleanout project. (SEIR, p. 124.) The above finding is made in that the following measures will mitigate the identified impact to a level of less than significant.

PSU-1.1: The water tank will be moved when the sediment fill is within 5 feet of the tank.

SECTION 2

SIGNIFICANT UNAVOIDABLE ENVIRONMENTAL EFFECTS WHICH CANNOT BE MITIGATED TO A LEVEL OF LESS THAN SIGNIFICANT

The County has determined that, although SEIR mitigation measures and proposals included as part of the project will substantially mitigate the following effects, these effects cannot be feasibly or effectively mitigated to a level of less than significant. Consequently, in accordance with Section 15093 of the State CEQA Guidelines, a Statement of Overriding Considerations has been prepared (see Section 8) to support the County's decision to accept these unavoidable environmental effects because of the benefits afforded by the project.

Air Quality

Potential Effect AQ-1: Reactive organic gases, nitrogen oxide, and particulate emissions criteria, established by the South Coast Air Quality Management District at 75, 100, and 150 pounds per day, respectively, may be exceeded during the construction period. The impact will be an increase over that analyzed in the CEIR since emergency major cleanouts will be conducted annually, as opposed to biannually for routine cleanout, will move more sediment than under normal circumstances, and will utilize trucking for transporting sediment. (SEIR, pp. 62, 64, 96.)

Findings Pursuant to State CEQA Guidelines § 15091 – Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the project alternatives identified in the final EIR. The impact identified in the SEIR cannot be mitigated to a level of less than significant. However, mitigation measures and features incorporated into the project will reduce to the extent feasible the adverse environmental effect. The above finding is made in conjunction with a Statement of Overriding Considerations adopted for the proposed project in that the following measures will partially mitigate the identified impact.

Facts Supporting Finding – One or a combination of the following measures will limit dust impacts. Activities to bind the disturbed soil in place, such as watering or cover, limits the ability of the dust to become airborne. Vehicle speed and washing limits the amount of dust that can become airborne or transported off-site onto roadways and then dispersed into the air by traffic. Proper vehicle maintenance ensures their highest possible emissions efficiency. (See SEIR, pp. 122, 126-127.)

AQ-1.1: Water-down earthwork areas and unpaved transport routes as needed. To minimize water consumption, chemical soil binders could also be used on the transport routes, as approved by applicable regulatory agencies.

AQ1.2: Suppress earthmoving activities involving non-enclosed methods of transport during periods of high wind (i.e., wind speeds of over 25 miles per hour).

AQ1.3: Wash the wheels and/or tracks of earthmoving equipment.

AQ1.4: Cover or wet sediment loads being transported by scrapers or other equipment into the SPS, depending on the already-existing moisture content of the soil.

AQ-1.5: Cover disturbed areas subject to wind erosion with fine netting, tarp, or other material depending upon the soil moisture content of the soil.

AQ1.6: Erect a barrier along the downwind perimeter of the earthmoving areas to prevent dust particle transport into the wilderness area.

AQ1.7: Limit on-site vehicle speed to 15 mph.

AQ1.8: Minimize the transport of sediment by equipment through the use of vehicles that carry larger loads in less trips and can be effectively covered.

AQ1.9: The following mitigation measures shall be implemented to reduce the vehicle emission impacts:

1. Utilize low sulfur content fuel in all equipment.

2. Equipment shall not be allowed to idle more than 15 minutes. Equipment shall be turned off if not in operation for 15 minutes.

3. Maintain equipment engines and generators in proper tune (including keeping a record of scheduled maintenance and repairs for verification purposes).

4. Retrofit all equipment as technically and economically feasible with a diesel emulsification/catalytic conversion system to reduce emissions.

SECTION 3

SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES WHICH WOULD BE INVOLVED IN THE PROJECT SHOULD IT BE IMPLEMENTED

Sections 15126(c) and 15126.2(c) of the State CEQA Guidelines require that an EIR evaluate uses of nonrenewable resources, commitment of future generations to similar uses, irreversible damage resulting from environmental accidents associated with the project, and irretrievable commitments of resources to assure that such current consumption of nonrenewable resources is justified.

The proposed project will have an irreversible effect on views from recreational open spaces such as the Angeles National Forest by permanently altering the topography of Burro Canyon SPS and having San Gabriel Reservoir drained during every summer during the five-year duration of the project. (SEIR, pp. 83-84, 110-111.) Burro Canyon is a designated SPS per the U.S. Forest Service Management Plan. The sand and gravel resources in the San Gabriel Reservoir that are placed in Burro Canyon SPS will be irretrievable. (SEIR, pp. 104, 119, 124, 127.)

Nonrecoverable material and energy would be used during cleanout activities, but existing supplies easily accommodate the amounts needed.

SECTION 4

GROWTH-INDUCING IMPACTS OF THE PROJECT

Section 15126 (d) of the State CEQA Guidelines requires that an EIR consider the ways that the proposed project could be considered growth-inducing.

The proposed project did not have any changed impacts on growth inducement over those analyzed in the CEIR. The project would comply with the flood control objectives of the U.S. Army Corps of Engineers and maintain adequate flood protection to the San Gabriel River Watershed downstream, which could prevent the imposition of growth-restricting flood insurance requirements. Maintaining adequate flood protection and the current supply of surface water for groundwater recharge in the Upper San Gabriel Valley would not foster economic or population growth or the construction of additional housing in the surrounding environment. Project construction would employ up to 50 workers, which would not substantially affect housing demand in Southern California. Thus, the project would not have substantial growth-inducing effects in the project area. (CEIR, p. 10-2.)

SECTION 5

FINDINGS REGARDING ALTERNATIVES

Sections 15126(f) and 15126.6 of the State CEQA Guidelines require that an EIR describe a range of reasonable alternatives to the project or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project. The range of alternatives is governed by the "rule of reason" to permit a reasoned choice and foster informed decision-making and informed public participation. Over 12 alternatives to the project were evaluated, including the "No Project" alternative for the CEIR. The alternatives discussed below for the SEIR are focused on those pertinent to a major sediment cleanout at San Gabriel Reservoir including the "No Project" alternative.

A. "No Project" Alternative

Description of Alternative: The "No Project" alternative as described in the SEIR proposes no major sediment removal activities at San Gabriel Reservoir as required by Section 15126.6(e) of the State CEQA Guidelines. (SEIR, p. 8.)

Comparison of Effects on the Alternative to Effects of the Proposed Project: The "No Project" alternative would eliminate impacts to air quality associated with the proposed project. (SEIR, p. 62.) It would also have no impacts on noise (SEIR, p. 73), transportation (id. at p. 76), energy (id. at p. 79), and cultural resources (id. at p. 84). However, this alternative was determined to have additional unmitigatable significant adverse impacts to earth resources (id. at p. 58), water quality (id. at p. 65), biology (id. at p. 68), natural resources (id. at p. 75), public services (id. at p. 77), recreation, aesthetics, and socioeconomic (id. at p. 81) that would not occur under the proposed project.

Effectiveness in Meeting the Project Objectives: The "No Project" alternative would not meet the project objectives specified in the SEIR. This alternative would result in sediment filling in San Gabriel Reservoir creating an increased flood danger to downstream urban areas and a loss of water conservation storage capacity in the reservoir. (SEIR, p. 8.)

Finding: The "No Project" alternative is not feasible.

Facts: The above finding is made in that:

(a) The "No Project" alternative is not feasible because this alternative fails to meet any of the objectives identified in the SEIR or to provide any of the benefits set forth therein.

(b) The alternative would result in an increased flood threat to the downstream urban areas adversely effecting public safety.

(c) The filling of the San Gabriel Reservoir with sediment would result in the loss of flood control capabilities that would have significant cumulative adverse impact on the U.S. Army Corps of Engineers improvements possibly rendering them inadequate.

(d) This alternative has a greater impact to earth resources, water quality, biology, natural resources, public services, recreation, aesthetics, and socioeconomics.

(e) This alternative would not preclude the potential subsequent implementation of alternatives or parts of alternatives that may individually achieve or cumulatively achieve project objectives.

B. The Sluicing Alternative

Description of Alternative: Alternative 2 would consist of sluicing sediment from San Gabriel Reservoir to Morris Reservoir. (SEIR, p. 8.) This Alternative was also included as part of the preferred project Alternative 5.

Comparison of Effects on the Alternative to Effects of the Proposed Project: This alternative would have unmitigatable significant adverse impacts to earth resources (SEIR, pp. 58-59), air quality (id. at p. 62),water quality (id. at pp. 65-66), biology (id. at pp. 69-70), and aesthetics (id. at p. 82).

Effectiveness in Meeting the Project Objectives: This alternative would meet the project objectives yet would take a longer time period.

Finding: This alternative was found to be feasible in the SEIR. However, as a result of comments received on the SEIR and other factors, the County has eliminated that part of the project that called for sluicing, and finds that it is not feasible.

C. The Convey to Burro Canyon SPS Alternative

Description of Alternative: Alternative 3 would employ earthmoving equipment and a conveyor belt system to remove and transport sediment from San Gabriel Reservoir to Burro Canyon SPS. (SEIR, pp. 9-10.) This Alternative was also included as part of the preferred project Alternative 5.

Comparison of Effects on the Alternative to Effects of the Proposed Project: This alternative was determined to result in significant impacts to air quality (SEIR, pp. 63-64), earth resources (id. at p. 59), and water quality (id. at pp. 66-67).

Effectiveness in Meeting the Project Objectives: This alternative effectively meets the project objectives. However, this alternative alone may not move enough sediment over the next five years given the amount of sediment that has to be removed as a result of the fires.

Finding: This alternative is feasible.

Facts: The above findings are made in that:

> This alternative would not preclude the potential subsequent implementation of alternatives or parts of alternatives, which may individually achieve or cumulatively achieve project objectives.

D. The Trucking to Burro Canyon SPS Alternative

Description of Alternative: Alternative 4 would employ earthmoving equipment and trucks to transport sediment from San Gabriel Reservoir to Burro Canyon SPS. (SEIR, p. 10-12.) This alternative was also included as part of the preferred project Alternative 5.

Comparison of Effects on the Alternative to Effects of the Proposed Project: This alternative was determined to result in significant impacts to air quality (SEIR, pp. 64, 97) and earth resources (SEIR, pp. 61, 95).

Effectiveness in Meeting the Project Objectives: This alternative effectively meets the project objectives. However, this alternative alone may not move enough sediment over the next five years given the amount of sediment that has to be removed as a result of the fires.

Finding: This alternative is feasible.

Facts: The above findings are made in that:

> This alternative would not preclude the potential subsequent implementation of alternatives or parts of alternatives, which may individually achieve or cumulatively achieve project objectives.

SECTION 6

CERTIFICATION OF THE SEIR

Pursuant to State CEQA Guidelines § 15090, the County of Los Angeles certifies that:

(1) the San Gabriel Canyon Sediment Management Plan Final Supplemental Environmental Impact Report dated September 2003 (SEIR), State Clearinghouse No. 1992061009, is an accurate and objective statement that fully complies with CEQA, the State CEQA Guidelines and the County Environmental Guidelines;

(2) as the decisionmaking body for the County of Los Angeles, the SEIR was presented to the Board of Supervisors, and the Board reviewed and considered the information in the SEIR prior to approving the project; and

(3) the SEIR reflects the County of Los Angeles' independent judgment and analysis.

The County of Los Angeles Board of Supervisors further finds that no comments made during the review period for the SEIR or any discussion added to the SEIR by the lead agency rises to the level of significant new information requiring recirculation or additional environmental review pursuant to State CEQA Guidelines § 15088.5.

SECTION 7

FINDINGS REGARDING MITIGATION MONITORING PROGRAM MONITORING PLAN

Requirement of Mitigation Monitoring Plan

Section 21081.6 of the Public Resources Code requires that when a public agency is making findings required by State CEQA Guidelines Section 15091(a)(1) and Section 21081 of the Public Resources Code, the public agency shall adopt a reporting or monitoring program for the changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment.

The County hereby finds that the Mitigation Monitoring Program, attached hereto as Enclosure C, meets the requirements of Section 21081.6 of the Public Resources Code by providing for the implementation and monitoring of project conditions intended to mitigate potential environmental effects.

SECTION 8

STATEMENT OF OVERRIDING CONSIDERATIONS

The SEIR identified and discussed significant effects, which will occur as a result of the proposed project. With the implementation of the mitigation measures discussed in the SEIR, these effects can be mitigated to a level of less than significant except for unavoidable significant impacts on air quality as identified in Section 2 herein.

Having balanced the benefits of the proposed project against its unavoidable adverse impacts pursuant to State CEQA Guidelines § 15093, the Board finds that the benefits of the project outweigh the unavoidable adverse impacts, and that the unavoidable adverse impacts are nonetheless "acceptable" based on the following overriding considerations:

(a) The project is needed to maintain an adequate level of flood control protection to communities in the Los Angeles Basin. As a result of the Curve and Williams Fires, the potential for significant deposition of sediment in the San Gabriel Reservoir exists. Deposition from major storm events could severely and very quickly impact the flood storage capacity of the San Gabriel Reservoir. Loss of this storage capacity endangers downstream communities. The deposition of sediment above the intake elevation of San Gabriel Dam's outlet tower jeopardizes the dam's valves. If the valves are rendered inoperable due to sediment deposition, it is very difficult, costly, and time consuming to repair the valves. Downstream communities would be placed in jeopardy until the valves were repaired. Downstream communities directly dependant on the San Gabriel Dam and Reservoir for flood protection include Azusa, Duarte, Irwindale, Baldwin Park, El Monte, City of Industry, Whittier, Pico Rivera, Santa Fe Springs, Downey, Norwalk, Bellflower, Cerritos, Lakewood, Los Alamitos, Seal Beach, and Long Beach.

(b) The project is needed to conserve water for the beneficial use by residents of Los Angeles County because sediment deposition reduces the storage volume which could be used to impound native water for groundwater recharge during the summer months. Water conservation benefits are becoming more important in Los Angeles County due to the increasing costs of importing water. Imported water is becoming more costly and limited in availability due to environmental concerns near the supply sources and the increasing demands on the existing supply of imported water. Removal of sediment allows more native water to be recharged and used by the downstream communities at a later date.

(c) The foregoing benefits provided to the public through the approval and implementation of the project outweigh the identified significant environmental effects of the project that cannot be mitigated.

SECTION 9

CUSTODIAN OF RECORDS

Pursuant to the Public Resources Code § 21081.6(a)(2), the location and custodian of the documents or other material, which constitute the record of proceedings upon which this decision is based is:

Ms. Patricia Wood
County of Los Angeles Department of Public Works
Water Resources Division
900 South Fremont Avenue, 2nd Floor
Alhambra, CA 91803